

EXHIBIT A

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Clay J.	Pierce	10/31/2017	1.20	700.00	\$840.00	Emails regarding kick off meeting; research regarding prior constitutional/due process claims versus New York State.
Clay J.	Pierce	11/3/2017	1.40	700.00	\$980.00	Review research materials forwarded by client.
Clay J.	Pierce	11/6/2017	2.80	700.00	\$1,960.00	Review background materials; emails with team.
Justin M.	Ginter	11/7/2017	0.60	300.00	\$180.00	Review case and matter materials.
Justin M.	Ginter	11/8/2017	1.20	300.00	\$360.00	Review matter documents and relevant cases/statutes; attend internal DBR conference call.
Andrew L.	Van Houter	11/9/2017	1.50	300.00	\$450.00	Telephone call with co-counsel regarding case status and follow up regarding same; research regarding amended complaint.
Justin M.	Ginter	11/10/2017	0.50	300.00	\$150.00	Conduct due process-related research.
Justin M.	Ginter	11/12/2017	1.30	300.00	\$390.00	Conduct research in connection with potential due-process related claims.
Andrew L.	Van Houter	11/12/2017	0.30	300.00	\$90.00	Research regarding potential statutory claims.
Justin M.	Ginter	11/13/2017	2.20	300.00	\$660.00	Continue to conduct research in connection with potential due-process related claims.
Justin M.	Ginter	11/14/2017	0.80	300.00	\$240.00	Continue to conduct research in connection with potential due-process related claims.
Andrew L.	Van Houter	11/14/2017	0.70	300.00	\$210.00	Research regarding potential statutory claims.
Clay J.	Pierce	11/16/2017	2.70	700.00	\$1,890.00	Review research materials; review draft complaint; revisions and additional research re same.
Justin M.	Ginter	11/16/2017	3.30	300.00	\$990.00	Continue to conduct research in connection with potential due-process related claims (3.0); draft email correspondence to DBR team regarding same (.3).
Clay J.	Pierce	11/17/2017	2.60	700.00	\$1,820.00	Telephone conferences with DBR team, NCLEJ, New Economy regarding legal strategy issues, potential claims; review and comment on draft complaint.
Justin M.	Ginter	11/21/2017	0.10	300.00	\$30.00	Confer with A. Van Houter regarding status of matter.
Clay J.	Pierce	11/22/2017	3.70	700.00	\$2,590.00	Review additional case law, research materials from DBR team, NCLEJ; edits to draft complaint.
Andrew L.	Van Houter	11/22/2017	2.70	300.00	\$810.00	Research regarding collection of damages in federal court and emails regarding same.
Clay J.	Pierce	11/28/2017	1.10	700.00	\$770.00	Emails regarding revisions to draft complaint, co-counseling agreement.
Justin M.	Ginter	11/30/2017	1.00	300.00	\$300.00	Compare draft complaint with attorney notes regarding named plaintiffs (.8); review Anderson v. White (3d Cir.) (.2).
Justin M.	Ginter	12/1/2017	1.20	300.00	\$360.00	Continue to review complaint and attorney notes (.7); confer with G. Hartman, A. VanHouter and R. Lomuscio regarding factual section of complaint and issues with identified plaintiffs (.5)
Andrew L.	Van Houter	12/1/2017	0.40	300.00	\$120.00	Telephone call with J. Hartman and J. Ginter regarding draft complaint.
Justin M.	Ginter	12/5/2017	0.20	300.00	\$60.00	Review update regarding proposed plaintiff Evans and evaluate implications of new facts.
Clay J.	Pierce	12/6/2017	1.40	700.00	\$980.00	Review and revise newest version of draft complaint.
Clay J.	Pierce	12/7/2017	1.70	700.00	\$1,190.00	Revise draft complaint; emails regarding same.
Clay J.	Pierce	12/7/2017	0.90	700.00	\$630.00	DBR team call regarding litigation strategy, fact questions.
Clay J.	Pierce	12/7/2017	0.80	700.00	\$560.00	Review due process cases.
Justin M.	Ginter	12/7/2017	0.40	300.00	\$120.00	Review and analyze revisions to draft complaint from J. Hartman and C. Pierce.
Justin M.	Ginter	12/7/2017	0.90	300.00	\$270.00	Confer with Drinker Biddle team regarding plaintiff fact issues and outstanding due process questions.
Justin M.	Ginter	12/7/2017	0.30	300.00	\$90.00	Review and analyze cases circulated by A. Van Houter related to Article 78 proceedings and due process.
Andrew L.	Van Houter	12/7/2017	1.30	300.00	\$390.00	Revise draft complaint and discussions regarding same.
Clay J.	Pierce	12/8/2017	2.40	700.00	\$1,680.00	Research regarding due process claims based on destruction of documents necessary for defense.
Justin M.	Ginter	12/8/2017	2.70	300.00	\$810.00	Continue to research issues related to due process claims.
Justin M.	Ginter	12/8/2017	0.10	300.00	\$30.00	Review case analysis from J. Hartman and A. Van Houter.
Andrew L.	Van Houter	12/8/2017	1.50	300.00	\$450.00	Research regarding due process claims and discussions regarding same.
Andrew L.	Van Houter	12/10/2017	0.20	300.00	\$60.00	Research regarding exhaustion requirement for 1983 claims.
Justin M.	Ginter	12/11/2017	0.10	300.00	\$30.00	Review analysis of case law circulated by J. Hartman.
Justin M.	Ginter	12/11/2017	1.80	300.00	\$540.00	Research issues related to an agency's failure to retain documents and draft summary of findings.
Andrew L.	Van Houter	12/11/2017	0.60	300.00	\$180.00	Discussions regarding research on due process issues.
Clay J.	Pierce	12/12/2017	1.20	700.00	\$840.00	Review due process research from J. Ginter; email regarding same to DBR team.
Clay J.	Pierce	12/12/2017	1.30	700.00	\$910.00	Revisions to draft complaint.
Clay J.	Pierce	12/12/2017	0.80	700.00	\$560.00	Telephone conference with DBR, NCLEJ, and New Economy teams regarding revisions to complaint.
Clay J.	Pierce	12/12/2017	0.50	700.00	\$350.00	Telephone conference with J. Hartman regarding revisions to complaint, potential motion for class certification, timing for same.
Justin M.	Ginter	12/12/2017	0.50	300.00	\$150.00	Review C. Pierce's analysis of case law and prepare to conduct additional research based upon cases discussed (.1); review additional analysis by A. Van Houter and J. Hartman regarding due process issues (.1); analyze and forward additional case law to C. Pierce (.3).

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Clay J.	Pierce	12/13/2017	2.40	700.00	\$1,680.00	Emails regarding further due process research; review and revise latest draft of complaint; emails, telephone conferences regarding same.
Justin M.	Ginter	12/13/2017	0.50	300.00	\$150.00	Compile revisions to complaint by J. Hartman and C. Pierce into a clean version of a revised draft complaint.
Justin M.	Ginter	12/13/2017	0.10	300.00	\$30.00	Review C. Pierce's analysis of case law and plan and prepare to compile additional cases related to same.
Andrew L.	Van Houter	12/13/2017	0.30	300.00	\$90.00	Discussions regarding draft complaint and emails regarding same.
Clay J.	Pierce	12/14/2017	2.30	700.00	\$1,610.00	Revisions to latest version of draft complaint; conference regarding same with R. Lomuscio.
Clay J.	Pierce	12/15/2017	3.20	700.00	\$2,240.00	Revisions to complaint; emails, telephone conferences regarding same.
Justin M.	Ginter	12/15/2017	0.10	300.00	\$30.00	Review and respond to email regarding status of Second Circuit law relating to mooted class claims.
Justin M.	Ginter	12/15/2017	0.40	300.00	\$120.00	Review and analyze draft complaint incorporating revisions by C. Pierce and J. Hartman.
Andrew L.	Van Houter	12/17/2017	2.10	300.00	\$630.00	Revise complaint.
Clay J.	Pierce	12/18/2017	2.10	700.00	\$1,470.00	Review latest revisions to complaint and research from J. Ginter.
Justin M.	Ginter	12/18/2017	0.20	300.00	\$60.00	Review email from J Hartman email excerpting Krimstock case.
Andrew L.	Van Houter	12/18/2017	1.50	300.00	\$450.00	Revise draft complaint and discussions regarding same.
Clay J.	Pierce	12/19/2017	1.70	700.00	\$1,190.00	Client telephone conference regarding edits to draft complaint, factual issues potentially requiring a delay of filing for same.
Andrew L.	Van Houter	12/19/2017	0.50	300.00	\$150.00	Discussions with J. Ginter, C. Pierce, R. Lomuscio and J. Hartman regarding draft complaint.
Clay J.	Pierce	12/20/2017	1.10	700.00	\$770.00	Review further revised draft of complaint; comments to same; review newly forwarded client documents; emails regarding same.
Justin M.	Ginter	12/20/2017	0.40	300.00	\$120.00	Conduct a comparison of Complaint citations and statutory framework.
Andrew L.	Van Houter	12/20/2017	0.80	300.00	\$240.00	Draft email regarding law on mooted class claims in Second Circuit.
Justin M.	Ginter	1/11/2018	0.20	300.00	\$60.00	Review TAB's responses to Mr. Evan's RVDJs; review summary of call (TAB).
Andrew L.	Van Houter	1/11/2018	0.50	300.00	\$150.00	Analyze disposition documents from TAB and draft email regarding same.
Justin M.	Ginter	2/28/2018	0.20	300.00	\$60.00	Review and analyze email correspondence and documents related to Mr. Evans.
Justin M.	Ginter	3/15/2018	0.10	300.00	\$30.00	Review update in connection with potential plaintiff regarding tax offset.
Justin M.	Ginter	5/9/2018	0.10	300.00	\$30.00	Review update from C. Wilner regarding plaintiff Marc and the \$10 copying fee.
Justin M.	Ginter	5/10/2018	0.10	300.00	\$30.00	Review email correspondence regarding status updates and strategy.
Justin M.	Ginter	5/16/2018	0.20	300.00	\$60.00	Review and analyze update from New Economy regarding visit to TAB on behalf of Mr. Evans.
Clay J.	Pierce	5/24/2018	0.50	700.00	\$350.00	Telephone conference with all counsel regarding case status, proposed revisions to complaint; emails regarding same.
Clay J.	Pierce	5/25/2018	1.50	700.00	\$1,050.00	Review most recent draft of complaint; emails with A. Van Houter.
Andrew L.	Van Houter	5/25/2018	0.70	300.00	\$210.00	Analyze draft complaint and factual developments that require revisions to complaint.
Andrew L.	Van Houter	5/27/2018	0.20	300.00	\$60.00	Telephone call with C. Pierce regarding draft complaint.
Andrew L.	Van Houter	5/27/2018	0.50	300.00	\$150.00	Research regarding draft complaint.
Andrew L.	Van Houter	5/29/2018	2.20	300.00	\$660.00	Research regarding due process violations for charging for document review.
Clay J.	Pierce	6/1/2018	2.10	700.00	\$1,470.00	Call with New Economy, NCLEJ regarding complaint draft, revisions to same; prepare for same.
Andrew L.	Van Houter	6/1/2018	0.20	300.00	\$60.00	Telephone call with C. Pierce regarding draft complaint.
Justin M.	Ginter	6/5/2018	0.10	300.00	\$30.00	Review A. VanHouter's revisions to draft complaint and prepare to analyze and address same.
Andrew L.	Van Houter	6/5/2018	4.00	300.00	\$1,200.00	Revise draft complaint to incorporate recent factual developments.
Justin M.	Ginter	6/6/2018	1.30	300.00	\$390.00	Review and revise draft complaint.
Andrew L.	Van Houter	6/6/2018	1.00	300.00	\$300.00	Revise complaint.
Justin M.	Ginter	6/8/2018	0.10	300.00	\$30.00	Review report from R. Carrillo (New Economy NYC) regarding visit to TAB.
Justin M.	Ginter	6/11/2018	0.10	300.00	\$30.00	Review edits to draft complaint by Jerry Hartman.
Andrew L.	Van Houter	6/11/2018	0.30	300.00	\$90.00	Discussions with J. Ginter regarding draft complaint.
Andrew L.	Van Houter	6/11/2018	0.30	300.00	\$90.00	Analyze draft complaint.
Clay J.	Pierce	6/12/2018	0.80	700.00	\$560.00	Review latest draft of complaint and J. Hartman comments to same.
Clay J.	Pierce	6/13/2018	1.10	700.00	\$770.00	Review and comment on revised complaint; DBR team call regarding same.
Justin M.	Ginter	6/13/2018	1.40	300.00	\$420.00	Revise draft complaint and circulate to team.
Andrew L.	Van Houter	6/13/2018	0.70	300.00	\$210.00	Discussion with J. Hartman, C. Pierce and J. Ginter regarding draft complaint and follow up regarding same.
Andrew L.	Van Houter	6/18/2018	0.30	300.00	\$90.00	Research whether refund is damages or equitable relief.
Andrew L.	Van Houter	6/18/2018	0.30	300.00	\$90.00	Analyze complaint and draft email regarding same concerning allegations made upon information and belief.
Andrew L.	Van Houter	6/18/2018	0.70	300.00	\$210.00	Team telephone call regarding draft complaint.
Justin M.	Ginter	7/4/2018	0.30	300.00	\$90.00	Review comments to complaint by New Economy Project.
Clay J.	Pierce	8/2/2018	1.20	700.00	\$840.00	Review revised complaint; emails regarding same.
Andrew L.	Van Houter	8/2/2018	0.40	300.00	\$120.00	Analyze revised complaint.

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Andrew L.	Van Houter	8/2/2018	0.40	300.00	\$120.00	Teleconference with co-counsel regarding draft complaint and follow up regarding same.
Clay J.	Pierce	8/8/2018	1.10	700.00	\$770.00	Telephone conference regarding comments to draft complaint; prepare for same.
Andrew L.	Van Houter	8/8/2018	1.50	300.00	\$450.00	Research regarding pleading standards for Section 1983 cases.
Andrew L.	Van Houter	8/9/2018	0.40	300.00	\$120.00	Team telephone conference regarding complaint.
Andrew L.	Van Houter	8/9/2018	0.40	300.00	\$120.00	Telephone call with G. Hartman and C. Pierce regarding complaint.
Andrew L.	Van Houter	8/13/2018	1.70	300.00	\$510.00	Revise draft complaint.
Justin M.	Ginter	8/14/2018	0.30	300.00	\$90.00	Review and analyze revised complaint.
Andrew L.	Van Houter	8/14/2018	3.50	300.00	\$1,050.00	Revise draft complaint.
Clay J.	Pierce	8/22/2018	0.60	700.00	\$420.00	Emails regarding revised complaint, call to discuss same.
Andrew L.	Van Houter	8/31/2018	0.20	300.00	\$60.00	Team telephone call regarding draft complaint.
Clay J.	Pierce	9/6/2018	0.40	700.00	\$280.00	Conference call with J. Hartmann and A. Van Houter regarding status, strategy issues.
Andrew L.	Van Houter	9/6/2018	0.50	300.00	\$150.00	Teleconference with J. Hartman and C. Pierce regarding draft complaint and follow up regarding same.
Andrew L.	Van Houter	9/16/2018	0.30	300.00	\$90.00	Analyze comments to draft complaint.
Justin M.	Ginter	9/19/2018	0.30	300.00	\$90.00	Review and analyze comments and revisions to the draft complaint.
Justin M.	Ginter	9/20/2018	0.30	300.00	\$90.00	Confer with A. Van Houter regarding outstanding items in connection with draft complaint.
Andrew L.	Van Houter	9/20/2018	0.30	300.00	\$90.00	Telephone call with J. Hartman and C. Pierce regarding draft complaint.
Andrew L.	Van Houter	9/20/2018	0.30	300.00	\$90.00	Discussions with J. Ginter regarding outstanding research issues.
Andrew L.	Van Houter	9/20/2018	0.30	300.00	\$90.00	Analyze NCLEJ's comments to draft complaint.
Clay J.	Pierce	9/21/2018	1.10	700.00	\$770.00	Review G. Hartmann edits to complaint; emails regarding meeting with co-counsel.
Andrew L.	Van Houter	9/26/2018	1.00	300.00	\$300.00	Analyze comments to draft complaint and communications regarding same.
Andrew L.	Van Houter	9/27/2018	0.20	300.00	\$60.00	Discussions with C. Pierce regarding draft complaint.
Clay J.	Pierce	9/28/2018	1.40	700.00	\$980.00	Internal telephone conferences and emails with co plaintiff counsel regarding revisions to and finalization of complaint; review comments to same.
Andrew L.	Van Houter	9/28/2018	0.30	300.00	\$90.00	Telephone call with J. Hartman, C. Pierce and J. Ginter regarding draft complaint.
Clay J.	Pierce	10/21/2018	1.10	700.00	\$770.00	Review latest version of draft complaint and supporting documentation; email to co-counsel re all hands meeting.
Justin M.	Ginter	10/25/2018	0.90	300.00	\$270.00	Confer with Appellate Division and investigate retrieval of record for Watts v Wing; confer with A. VanHouter regarding same.
Clay J.	Pierce	10/29/2018	4.70	700.00	\$3,290.00	All hands meeting to discuss finalization of complaint; prepare for same.
Justin M.	Ginter	10/29/2018	0.70	300.00	\$210.00	Plan and prepare to conduct research regarding class certification requirements; conduct research regarding same.
Andrew L.	Van Houter	10/29/2018	0.50	300.00	\$150.00	Follow up research and correspondence regarding complaint drafting.
Andrew L.	Van Houter	10/29/2018	2.00	300.00	\$600.00	Prepare for team meeting drafting session; analyze relevant documents.
Andrew L.	Van Houter	10/29/2018	4.00	300.00	\$1,200.00	Participate in meeting with co-counsel to draft complaint.
Justin M.	Ginter	10/31/2018	1.00	300.00	\$300.00	Continue to research issues regarding class certification.
Justin M.	Ginter	11/4/2018	1.80	300.00	\$540.00	Continue to research issues regarding class certification.
Andrew L.	Van Houter	11/4/2018	1.50	300.00	\$450.00	Revise draft complaint.
Andrew L.	Van Houter	11/5/2018	3.10	300.00	\$930.00	Revise draft complaint.
Justin M.	Ginter	11/6/2018	2.40	300.00	\$720.00	Continue to research issues regarding class certification.
Clay J.	Pierce	11/7/2018	0.80	700.00	\$560.00	Review changes to draft complaint.
Justin M.	Ginter	11/7/2018	1.70	300.00	\$510.00	Review research results in preparation for conference with C. Pierce and A. VanHouter (.8); confer with C. Pierce and A. VanHouter in connection status of complaint and research regarding class action designations (.3); summarize research results (.5); review email correspondence from J. Hartman (.1).
Andrew L.	Van Houter	11/7/2018	0.80	300.00	\$240.00	Revise draft complaint and correspondence regarding same.
Andrew L.	Van Houter	11/7/2018	0.40	300.00	\$120.00	Conference with C. Pierce and J. Ginter regarding research concerning draft complaint.
Clay J.	Pierce	11/8/2018	1.00	700.00	\$700.00	Weekly status call.
Justin M.	Ginter	11/8/2018	0.10	300.00	\$30.00	Review revisions to complaint from J. Hartman.
Andrew L.	Van Houter	11/8/2018	0.80	300.00	\$240.00	Telephone call with J. Hartman regarding draft complaint.
Clay J.	Pierce	11/12/2018	1.20	700.00	\$840.00	Emails regarding further research into request for damages in Rule 23(b)(2) class action; review cases cited by J. Ginter.
Justin M.	Ginter	11/12/2018	3.40	300.00	\$1,020.00	Continue research in connection with class action classification.
Justin M.	Ginter	11/12/2018	0.20	300.00	\$60.00	Email correspondence with DBR team regarding class action classification issues.
Andrew L.	Van Houter	11/12/2018	1.50	300.00	\$450.00	Analyze research regarding class certification and draft email memorandum regarding same.
Clay J.	Pierce	11/13/2018	2.30	700.00	\$1,610.00	Review research on request for incidental damages in connection with 23(b)(2) class action; conference call with DBR team, G. Hartmann regarding same.
Justin M.	Ginter	11/13/2018	2.00	300.00	\$600.00	Continue to research class certification classification issues and draft email to DBR team with comments and to schedule call.
Andrew L.	Van Houter	11/13/2018	0.80	300.00	\$240.00	Telephone call with J. Hartman, C. Pierce and J. Ginter regarding class definition.
Andrew L.	Van Houter	11/13/2018	0.30	300.00	\$90.00	Telephone call with C. Pierce regarding class certification.

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Andrew L.	Van Houter	11/13/2018	0.30	300.00	\$90.00	Analyze research regarding class certification.
Clay J.	Pierce	11/14/2018	1.10	700.00	\$770.00	Emails regarding proposed request for damages, likely impact on class certification request.
Justin M.	Ginter	11/14/2018	0.30	300.00	\$90.00	Evaluate class definitions for (b)(2) and (b)(3) and review team emails related to same.
Andrew L.	Van Houter	11/14/2018	0.30	300.00	\$90.00	Discussions with C. Pierce regarding class definition.
Andrew L.	Van Houter	11/14/2018	0.40	300.00	\$120.00	Research regarding class definition and draft same.
Clay J.	Pierce	11/15/2018	2.60	700.00	\$1,820.00	Plaintiffs' counsel conference call regarding potential request for damages as part of class complaint, applicable provisions of Rule 23, possible definitions of putative class.
Justin M.	Ginter	11/15/2018	0.10	300.00	\$30.00	Confer with C. Pierce regarding class certification research.
Justin M.	Ginter	11/15/2018	0.10	300.00	\$30.00	Confer with J. Hartman regarding class certification strategy.
Andrew L.	Van Houter	11/15/2018	0.30	300.00	\$90.00	Discussion with C. Pierce regarding draft complaint and engagement letters.
Clay J.	Pierce	11/16/2018	3.10	700.00	\$2,170.00	Review research on class certification, request for return of tax refunds.
Justin M.	Ginter	11/16/2018	1.80	300.00	\$540.00	Review and analyze case law related to (B)(2) class certification, highlighting same for C. Pierce's review.
Justin M.	Ginter	11/16/2018	0.30	300.00	\$90.00	Confer with J. Hartman regarding class certification issues.
Clay J.	Pierce	11/18/2018	1.40	700.00	\$980.00	Review rule 23 cases.
Justin M.	Ginter	11/19/2018	0.30	300.00	\$90.00	Attention to issues in connection with (B)(2) class certification.
Andrew L.	Van Houter	11/19/2018	0.30	300.00	\$90.00	Telephone call with C. Pierce regarding research on (b)(2) certification.
Andrew L.	Van Houter	11/19/2018	1.00	300.00	\$300.00	Research possibility of (b)(2) certification and draft summary of same.
Andrew L.	Van Houter	11/19/2018	0.40	300.00	\$120.00	Analyze co-counsel's edits to draft complaint.
Clay J.	Pierce	11/26/2018	0.30	700.00	\$210.00	Emails regarding further comments to draft complaint, proposed class allegations.
Justin M.	Ginter	11/26/2018	0.10	300.00	\$30.00	Review Brown v. Kelly, as circulated by Marc Cohan.
Justin M.	Ginter	11/27/2018	0.20	300.00	\$60.00	Plan and prepare for DBR team meeting regarding complaint and class certification issues.
Clay J.	Pierce	11/28/2018	2.10	700.00	\$1,470.00	Review Rule 23 case law forwarded by G. Hartman and NCLEJ; conference call regarding same w/ DBR, G. Hartman; emails regarding same.
Justin M.	Ginter	11/28/2018	0.90	300.00	\$270.00	Analyze Brown v. Kelly case law and prepare summary for DBR team in advance of call.
Justin M.	Ginter	11/28/2018	0.10	300.00	\$30.00	Email correspondence to the team confirming conference call Thursday, November 29.
Justin M.	Ginter	11/28/2018	0.20	300.00	\$60.00	DBR team call regarding Brown v. Kelly.
Clay J.	Pierce	11/29/2018	0.90	700.00	\$630.00	Weekly status call with New Economy, NCLEJ; prepare for same.
Justin M.	Ginter	11/29/2018	0.20	300.00	\$60.00	Review additional class certification cases circulated by Marc Cohan.
Andrew L.	Van Houter	11/29/2018	0.30	300.00	\$90.00	Discussions with C. Pierce regarding status of complaint.
Justin M.	Ginter	11/30/2018	0.50	300.00	\$150.00	Confer with J. Hartman regarding class certification issues; attention to same.
Justin M.	Ginter	12/4/2018	0.10	300.00	\$30.00	Email correspondence with J. Hartman regarding status and Rule 23 amendments.
Justin M.	Ginter	12/5/2018	3.20	300.00	\$960.00	Conduct legal research regarding availability of damages for 1983 and procedural due process claims; draft memorandum and circulate to group.
Clay J.	Pierce	12/6/2018	0.90	700.00	\$630.00	Telephone conference with G. Hartman, A. Van Houter regarding weekly conference call.
Justin M.	Ginter	12/6/2018	0.20	300.00	\$60.00	Various email correspondence with Clay, Jerry and Andy regarding class certification and damages issues.
Justin M.	Ginter	12/7/2018	0.10	300.00	\$30.00	Email correspondence with J. Hartman.
Andrew L.	Van Houter	12/10/2018	3.00	300.00	\$900.00	Revise complaint; draft engagement letter.
Andrew L.	Van Houter	12/11/2018	0.50	300.00	\$150.00	Revise draft complaint and engagement letter and draft email to team regarding same.
Andrew L.	Van Houter	12/11/2018	0.50	300.00	\$150.00	Meeting with C. Pierce to discuss draft complaint and engagement letter.
Andrew L.	Van Houter	12/12/2018	0.20	300.00	\$60.00	Correspondence regarding class definition.
Clay J.	Pierce	12/13/2018	2.10	700.00	\$1,470.00	Internal telephone conferences, emails regarding class certification issues, further research regarding same.
Justin M.	Ginter	12/13/2018	0.30	300.00	\$90.00	Analyze Amara v. CIGNA Corp. and Lauren v. PWC, circulated by NCLEJ, in advanced of call.
Andrew L.	Van Houter	12/13/2018	2.00	300.00	\$600.00	Participate in weekly team call regarding case status and draft complaint and follow up/prepare for same.
Justin M.	Ginter	12/19/2018	0.10	300.00	\$30.00	Review A VanHouter's analysis; plan to look into destroying records issue
Andrew L.	Van Houter	12/19/2018	2.50	300.00	\$750.00	Draft class definitions and research regarding same; draft email memo regarding potential issues.
Clay J.	Pierce	12/20/2018	1.50	700.00	\$1,050.00	Conference with A. Van Houter regarding ascertainability, related class certification issues; review relevant case law.
Justin M.	Ginter	12/20/2018	0.20	300.00	\$60.00	Attention to issues related to due process violations for destroying records.
Andrew L.	Van Houter	12/20/2018	0.50	300.00	\$150.00	Discussions with C. Pierce regarding issues with class definition and damages.
Andrew L.	Van Houter	12/21/2018	1.00	300.00	\$300.00	Draft email regarding issues with complaint.
Justin M.	Ginter	12/22/2018	0.20	300.00	\$60.00	Review class certification analysis from C. Pierce.
Andrew L.	Van Houter	12/26/2018	0.10	300.00	\$30.00	Correspondence regarding draft complaint.
Andrew L.	Van Houter	12/27/2018	0.10	300.00	\$30.00	Correspondence regarding draft complaint.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Justin M.	Ginter	1/2/2019	0.20	300.00	\$60.00	Review revised complaint from New Economy Project.
Andrew L.	Van Houter	1/2/2019	0.20	300.00	\$60.00	Analyze New Economy's edits to draft complaint.
Clay J.	Pierce	1/3/2019	1.80	700.00	\$1,260.00	Emails, telephone conferences with G. Hartman, A. Van Houter regarding class certification definition, proposed restitution claim; review research regarding same.
Andrew L.	Van Houter	1/3/2019	1.00	300.00	\$300.00	Teleconference with C. Pierce and J. Hartman regarding class definition and restitution and prepare for same.
Andrew L.	Van Houter	1/3/2019	0.50	300.00	\$150.00	Correspondence with J. Hartman regarding fail safe classes and research regarding same.
Clay J.	Pierce	1/8/2019	0.80	700.00	\$560.00	Emails with pro bono counsel regarding class certification issues.
Andrew L.	Van Houter	1/8/2019	0.40	300.00	\$120.00	Correspondence regarding draft complaint and class definition.
Andrew L.	Van Houter	1/8/2019	0.60	300.00	\$180.00	Research regarding ascertainability.
Clay J.	Pierce	1/9/2019	0.90	700.00	\$630.00	Comments to draft court filings; emails re same.
Justin M.	Ginter	1/9/2019	0.20	300.00	\$60.00	Prepare for and confer with A. VanHouter and C. Pierce in advance of weekly team call to discuss certification issues raised by M. Cohan.
Clay J.	Pierce	1/11/2019	1.80	700.00	\$1,260.00	Telephone conferences with public interest partners, DBR team regarding claim for restitution, class definition issues
Andrew L.	Van Houter	1/11/2019	0.50	300.00	\$150.00	Telephone call with C. Pierce and J. Hartman regarding class definition and refunds and follow up regarding same.
Andrew L.	Van Houter	1/11/2019	1.00	300.00	\$300.00	Research and preparation for team call regarding class definition and restitution.
Justin M.	Ginter	1/16/2019	0.10	300.00	\$30.00	Review email correspondence from M. Cohan regarding class certification and restitution issues.
Clay J.	Pierce	1/17/2019	1.40	700.00	\$980.00	Revisions to draft complaint and related documents; weekly call with pro bono counsel.
Andrew L.	Van Houter	1/22/2019	0.50	300.00	\$150.00	Discussions with C. Pierce regarding case status and follow up regarding same.
Clay J.	Pierce	1/23/2019	2.10	700.00	\$1,470.00	Review of draft class certification motion and supporting affidavits; emails regarding same.
Justin M.	Ginter	1/23/2019	0.30	300.00	\$90.00	Review and analyze draft memorandum of law in support of class certification.
Justin M.	Ginter	1/23/2019	0.30	300.00	\$90.00	Review draft declarations for two current plaintiffs and attorney defendant.
Andrew L.	Van Houter	1/23/2019	1.10	300.00	\$330.00	Revise motion for class certification and correspondence regarding case status.
Clay J.	Pierce	1/24/2019	1.80	700.00	\$1,260.00	Weekly call with pro bono counsel; review draft class certification motion and supporting affidavits.
Justin M.	Ginter	1/24/2019	0.10	300.00	\$30.00	Review email from R. Carillo (New Economy) concerning visit to TAB.
Justin M.	Ginter	1/28/2019	0.20	300.00	\$60.00	Review email correspondence from M. Cohan (NCLEJ) regarding class cert brief draft and Evans declaration.
Andrew L.	Van Houter	1/28/2019	0.40	300.00	\$120.00	Revise Evans declaration.
Clay J.	Pierce	1/29/2019	1.70	700.00	\$1,190.00	Review and comment on draft class certification brief and supporting client affidavits; emails, telephone conferences regarding same.
Andrew L.	Van Houter	1/29/2019	0.50	300.00	\$150.00	Discussion with C. Pierce and M. Cohan regarding motion for class certification and follow up regarding same.
Andrew L.	Van Houter	1/29/2019	2.30	300.00	\$690.00	Revise draft complaint and client affidavits.
Clay J.	Pierce	1/30/2019	0.90	700.00	\$630.00	Emails regarding comments to draft complaint, client declarations, talking points.
Justin M.	Ginter	1/30/2019	0.20	300.00	\$60.00	Review comments to draft complaint in advance of Thursday's teleconference; review M. Cohan's notes in connection with class cert brief.
Andrew L.	Van Houter	1/30/2019	0.40	300.00	\$120.00	Correspondence regarding draft papers.
Andrew L.	Van Houter	1/30/2019	1.20	300.00	\$360.00	Revise client affidavits.
Clay J.	Pierce	1/31/2019	0.80	700.00	\$560.00	Emails regarding comments to complaint, class certification papers, proposed talking points for publicity promotion activities.
Andrew L.	Van Houter	1/31/2019	0.30	300.00	\$90.00	Teleconference with J. Hartman regarding draft complaint and client affidavits.
Andrew L.	Van Houter	1/31/2019	0.20	300.00	\$60.00	Discussions with C. Pierce regarding case status.
Andrew L.	Van Houter	1/31/2019	1.50	300.00	\$450.00	Participate in team teleconference regarding draft complaint and motion for class certification and prepare for and follow up regarding same.
Justin M.	Ginter	2/1/2019	0.10	300.00	\$30.00	Review proposed paragraphs from NCLEJ for Mr. Evan's declaration.
Clay J.	Pierce	2/4/2019	1.20	700.00	\$840.00	Review revised drafts from A. Van Houter; emails with pro bono counsel regarding client facts.
Justin M.	Ginter	2/4/2019	0.50	300.00	\$150.00	Review S. Shin draft paragraphs to Robinson declaration (.1); review article from S. Ludwig (.1); review revisions to complaint and declarations from A. VanHouter (.3).
Andrew L.	Van Houter	2/4/2019	5.00	300.00	\$1,500.00	Revise client affidavits and research regarding same; revise class certification brief and research regarding same.
Justin M.	Ginter	2/5/2019	0.10	300.00	\$30.00	Plan and prepare to conduct research related to commonality and revise memorandum of law concerning same.
Andrew L.	Van Houter	2/5/2019	1.00	300.00	\$300.00	Correspondence and edits to documents for filing.
Justin M.	Ginter	2/6/2019	2.90	300.00	\$870.00	Research issues related to commonality and revise memorandum of law.
Andrew L.	Van Houter	2/7/2019	1.00	300.00	\$300.00	Lead weekly telephone call and follow up regarding same.
Andrew L.	Van Houter	2/7/2019	1.00	300.00	\$300.00	Revise class certification brief.
Justin M.	Ginter	2/8/2019	1.60	300.00	\$480.00	Conduct legal research and revise memorandum of law and complaint.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Andrew L.	Van Houter	2/11/2019	1.00	300.00	\$300.00	Revise documents for filing.
Justin M.	Ginter	2/12/2019	2.50	300.00	\$750.00	Revise and circulate memorandum of law in support of class certification and Robinson declaration; draft and revise civil cover sheet and summonses and circulate for review and comment; confer with C. Pierce and A. Van Houter regarding filing logistics; review SDNY rules in connection with electronic filing and service.
Andrew L.	Van Houter	2/12/2019	5.00	300.00	\$1,500.00	Revise documents for filing.
Clay J.	Pierce	2/13/2019	1.40	700.00	\$980.00	Finalize and file complaint and supporting papers; emails, telephone conferences regarding same, related publicity effort.
Andrew L.	Van Houter	2/13/2019	4.00	300.00	\$1,200.00	Finalize complaint and associated documents for filing.
Clay J.	Pierce	2/14/2019	4.80	700.00	\$3,360.00	Revise papers in support of motion for class certification; emails, telephone conferences regarding same, corrections to civil cover sheet and summonses; emails re selection of judge and scheduling of preliminary conference.
Andrew L.	Van Houter	2/14/2019	3.00	300.00	\$900.00	Finalize class certification brief for filing.
Andrew L.	Van Houter	2/14/2019	3.00	300.00	\$900.00	Finalize civil cover sheet and summonses for filing.
Justin M.	Ginter	2/19/2019	0.80	300.00	\$240.00	Draft and revise pre-motion letter in connection with motion for class certification.
Justin M.	Ginter	2/19/2019	0.10	300.00	\$30.00	Review NCLEI's analysis concerning class certification motion.
Justin M.	Ginter	2/19/2019	0.10	300.00	\$30.00	Review email correspondence concerning former TAB hearing officer.
Clay J.	Pierce	2/20/2019	3.50	700.00	\$2,450.00	Defense call regarding filing of class certification motion, necessity of filing pre-motion letter; drafted letter to court regarding same; emails regarding press stories regarding case.
Justin M.	Ginter	2/20/2019	1.20	300.00	\$360.00	Continue to draft and revise pre-motion letter in support of class certification motion.
Justin M.	Ginter	2/20/2019	0.40	300.00	\$120.00	Incorporate revisions and address comments by A. Van Houter to pre-motion letter; circulate to C. Pierce for review.
Justin M.	Ginter	2/20/2019	0.50	300.00	\$150.00	Revise cover letter in connection with motion for class certification as drafted and revised by C. Pierce.
Andrew L.	Van Houter	2/20/2019	2.10	300.00	\$630.00	Revise letter to court regarding class certification brief.
Clay J.	Pierce	2/21/2019	1.30	700.00	\$910.00	Emails, telephone conferences regarding motion for class certification, service of process on defendants.
Justin M.	Ginter	2/21/2019	0.60	300.00	\$180.00	Attention to service issues; conduct research related to same.
Andrew L.	Van Houter	2/21/2019	3.90	300.00	\$1,170.00	Finalize class certification briefing pages.
Clay J.	Pierce	2/22/2019	0.80	700.00	\$560.00	Emails regarding service of process, potential new plaintiffs, publicity efforts.
Justin M.	Ginter	2/25/2019	0.20	300.00	\$60.00	Review Notice of Violation forwarded by J. Hartman; plan and prepare to file motion for class certification documents.
Justin M.	Ginter	2/26/2019	2.40	300.00	\$720.00	Review and file motion for class certification and accompanying documents; confer with C. Pierce regarding same; evaluate issue concerning date on letter forwarded to chambers; confer with representative from the New York Attorney General's Office.
Andrew L.	Van Houter	2/26/2019	0.50	300.00	\$150.00	Attention to class certification filing.
Justin M.	Ginter	3/1/2019	0.10	300.00	\$30.00	Review email from J. Hartman concerning NOV's and language of complaint.
Justin M.	Ginter	3/5/2019	0.10	300.00	\$30.00	Review email from J. Hartman concerning default judgment issue.
Justin M.	Ginter	3/8/2019	0.10	300.00	\$30.00	Review email correspondence from team concerning other potential plaintiffs.
Justin M.	Ginter	3/13/2019	0.20	300.00	\$60.00	Review email correspondence containing agenda items and analysis of due process issue.
Justin M.	Ginter	3/21/2019	2.20	300.00	\$660.00	Email correspondence to C. Pierce regarding hosting call; attend weekly teleconference; confer with C. Pierce regarding strategy and next steps; analyze Judge Torres's rules; analyze Judge Moses' rules; analyze SDNY local rules concerning Rule 16 and Rule 26 requirements; circulate J. Torres's Order regarding pretrial conference adjournment.
Clay J.	Pierce	3/25/2019	1.60	700.00	\$1,120.00	Review local rules, rules for Judge Moses, initial case management conference order; team call regarding initial case management conference meet and confer, strategy issues for same; emails with opposing counsel regarding same.
Justin M.	Ginter	3/26/2019	1.80	300.00	\$540.00	Review email correspondence from J. Hartman concerning pro hac application; review procedure; draft pre-conference statement.
Clay J.	Pierce	3/27/2019	1.50	700.00	\$1,050.00	Meeting and confer with counsel for transition authority regarding initial case management conference; prepare for and follow up to same.
Clay J.	Pierce	3/28/2019	0.50	700.00	\$350.00	Emails regarding witness interviews, tax return issues.
Clay J.	Pierce	4/1/2019	0.80	700.00	\$560.00	Comments to draft joint pre-conference statement; emails, telephone conferences regarding same.
Justin M.	Ginter	4/1/2019	1.30	300.00	\$390.00	Attention to and revise Joint Rule 26 Pre-Conference Statement; send to opposing counsel for review; attention to case management dates.
Justin M.	Ginter	4/2/2019	1.90	300.00	\$570.00	Email correspondence concerning time and location for hearing officer interviews; email correspondence with J. Hartman regarding certificate of good standing; prepare for and attend team call; teleconference with J. Hartman; review and analyze Defendants' answer.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Clay J.	Pierce	4/3/2019	2.30	700.00	\$1,610.00	Interview with former TAB hearing officers; prepare for same.
Justin M.	Ginter	4/3/2019	0.10	300.00	\$30.00	Analyze docket activity concerning notices of appearance for opposing counsel.
Justin M.	Ginter	4/3/2019	0.10	300.00	\$30.00	Review certificate of good standing received from G. Hartman and address technical issues concerning same.
Clay J.	Pierce	4/4/2019	1.30	700.00	\$910.00	Emails, telephone conferences regarding preparation, revision and filing of joint pre-conference statement.
Justin M.	Ginter	4/4/2019	1.60	300.00	\$480.00	Email correspondence with C. Pierce regarding status; review Rule 502(d); review redline and comments to joint letter to Court; email correspondence to team for review and comment; finalize letter and file.
Clay J.	Pierce	4/5/2019	1.20	700.00	\$840.00	Telephone conference with opposing counsel regarding suspension of client's SWOP status; prepare for and follow up to same; emails regarding notes from witness interviews.
Clay J.	Pierce	4/8/2019	1.30	700.00	\$910.00	Emails with opposing counsel regarding pending hold on further seizure of client tax refunds; comments to draft interview summaries.
Justin M.	Ginter	4/8/2019	0.10	300.00	\$30.00	Review email correspondence concerning clients' SWOP files.
Clay J.	Pierce	4/9/2019	1.40	700.00	\$980.00	Weekly team call; prepare for and follow up to same.
Justin M.	Ginter	4/10/2019	0.70	300.00	\$210.00	Prepare materials in advance of initial conference; email correspondence with New Economy regarding documents received from clients; teleconference with J. Hartman.
Clay J.	Pierce	4/11/2019	3.50	700.00	\$2,450.00	Initial conference with Magistrate Moses; prepare for and follow up to same.
Clay J.	Pierce	4/12/2019	0.80	700.00	\$560.00	Follow up from preliminary case conference
Justin M.	Ginter	4/12/2019	0.10	300.00	\$30.00	Analyze Initial Case Management Order.
Clay J.	Pierce	4/15/2019	2.40	700.00	\$1,680.00	Emails regarding case scheduling order; review materials from former hearing officers.
Justin M.	Ginter	4/15/2019	0.50	300.00	\$150.00	Attention to case management dates pursuant to Initial Case Management Order; plan and prepare for team call on Tuesday, April 16; review NCLEJ's position concerning class certification.
Clay J.	Pierce	4/16/2019	2.40	700.00	\$1,680.00	Team call; emails regarding client criminal records, effect on motion for class certification; review criminal records; research regarding effect on class certification.
Clay J.	Pierce	4/17/2019	4.10	700.00	\$2,870.00	Meet and confer with opposing counsel regarding proposed agreement on class certification; follow up calls with NCLEJ, J. Hartman; revise, finalize and circulate memos re hearing officer witness interviews; emails regarding same with NCLEJ and New Economy.
Andrew L.	Van Houter	4/17/2019	0.30	300.00	\$90.00	Analyze memoranda of witness interviews
Clay J.	Pierce	4/18/2019	4.50	700.00	\$3,150.00	Calls, emails with opposing counsel regarding proposed stipulation to class certification, draft joint letter to court regarding status of class certification motion; revisions to letter based on negotiations with opposing counsel; emails re G. Hartman pro hac vice application.
Justin M.	Ginter	4/18/2019	3.20	300.00	\$960.00	Draft and revise pro hac application for J. Hartman; continue to research impact of criminal history as it relates to class certification; summarize research for C. Pierce; prepare for and attend team call concerning class certification motion; review email correspondence from opposing counsel concerning draft letter; revise draft letter for opposing counsel's review concerning adjournment of deadlines concerning class certification motion; email correspondence to team concerning same; incorporate comments from NCLEJ; send revised letter to opposing counsel.
Clay J.	Pierce	4/19/2019	2.80	700.00	\$1,960.00	Emails, telephone conferences regarding draft joint letter to court re status of class certification motion; revisions to letter based on same.
Justin M.	Ginter	4/19/2019	1.00	300.00	\$300.00	Revise letter concerning motion for class certification; file same; circulate copy of file letter to team and opposing counsel; review summary of and documents from Elaine Ing.
Clay J.	Pierce	4/22/2019	2.50	700.00	\$1,750.00	Review TAB materials provided by former hearing officer witnesses.
Clay J.	Pierce	4/23/2019	2.60	700.00	\$1,820.00	Review materials provided by former hearing officer; emails, telephone conferences regarding electronic discovery meet and confer.
Clay J.	Pierce	4/24/2019	2.60	700.00	\$1,820.00	Prepare for ESI meet and confer with opposing counsel; emails, telephone conferences regarding same.
Justin M.	Ginter	4/24/2019	3.70	300.00	\$1,110.00	Email correspondence with J. Hartman concerning pro hac; file same; coordinate with Tritura concerning metadata needs and specifications; email correspondence with C. Pierce and team on various ESI meet-and-confer issues; review outline of ESI meet and confer from Katie Deabler; draft and revise proposed search terms; revise search terms; prepare correspondence to team enclosing relevant documents in advance of meet and confer; plan and prepare for meet-and-confer; review email correspondence from co-counsel concerning approach to meet-and-confer and search terms.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Clay J.	Pierce	4/25/2019	3.60	700.00	\$2,520.00	Meet and confer with opposing counsel regarding electronic discovery issues, schedule for class certification briefing and discovery; prepare for and follow up to same.
Clay J.	Pierce	4/26/2019	1.70	700.00	\$1,190.00	Review documents provided by former hearing officers; emails re summary of meet and confer with plaintiffs' counsel.
Clay J.	Pierce	4/29/2019	2.10	700.00	\$1,470.00	Review and comment on summary of meet and confer with defendants; review materials provided by former hearing officers.
Clay J.	Pierce	4/30/2019	2.60	700.00	\$1,820.00	Weekly team call; prepare for and follow up to same.
Justin M.	Ginter	5/1/2019	0.50	300.00	\$150.00	Draft letter to Judge Moses concerning class certification discovery and briefing schedule.
Clay J.	Pierce	5/2/2019	2.30	700.00	\$1,610.00	Revise draft letter to court regarding class action briefing; emails regarding same; revise draft document requests.
Justin M.	Ginter	5/2/2019	0.80	300.00	\$240.00	Attention to class certification action items; revise letter to J. Moses concerning class certification discovery and briefing schedule; review notice of appearance on behalf of Lejla Hadzic.
Clay J.	Pierce	5/3/2019	4.30	700.00	\$3,010.00	Emails, telephone conferences regarding telephone conferences regarding letter to court re proposed schedule for class certification discovery and briefing; emails re revisions to requests for documents.
Justin M.	Ginter	5/3/2019	3.70	300.00	\$1,110.00	Conduct legal research concerning propounding written discovery prior to initial disclosures; confer with Helene concerning status of letter to Court regarding class discovery and briefing schedule; revise Plaintiffs' First Request for Production of Documents; revise letter to Court; email correspondence to team regarding revisions; email correspondence with Helene; file letter to court; review documents received from Defendants.
Clay J.	Pierce	5/6/2019	2.00	700.00	\$1,400.00	Team call; call with DBR team regarding projects; edits to do, case status; revisions to draft document requests.
Justin M.	Ginter	5/6/2019	2.50	300.00	\$750.00	Analyze K. Deabler's comments to requests for documents; draft email correspondence to C. Pierce and A. VanHouter concerning upcoming deadlines, outstanding action items, and summary of status of litigation; prepare for and attend call with C. Pierce and A. VanHouter; review memo endorsement to letter concerning briefing schedule; revise and circulate plaintiffs' request for production of documents; review comments from S. Shin concerning requests for production of documents and prepare to address same; review revisions from J. Hartman and prepare to address same.
Andrew L.	Van Houter	5/6/2019	0.50	300.00	\$150.00	Analyze case status and outstanding issues.
Clay J.	Pierce	5/7/2019	2.30	700.00	\$1,610.00	Emails, t/c's re edits to draft 30(b)(6) document request; further comments to same.
Justin M.	Ginter	5/7/2019	1.90	300.00	\$570.00	Revise requests for production to incorporate additional revisions from S. Shin and J. Hartman; incorporate additional comments from NCLEJ; review document preservation notice to plaintiffs; research service by email; serve requests for the production of documents; draft 30(b)(6) notice for NYCTA; review initial disclosure section from NCLEJ; teleconference with J. Hartman.
Justin M.	Ginter	5/8/2019	1.10	300.00	\$330.00	Draft and revise 30(b)(6) deposition notice; review New Economy's revisions to initial disclosure section; review high level notes from C. Wilner concerning initial disclosures; email correspondence with A. VanHouter concerning 30(b)(6) notice.
Andrew L.	Van Houter	5/8/2019	0.50	300.00	\$150.00	Revise draft 30(b)(6) notice.
Andrew L.	Van Houter	5/9/2019	0.60	300.00	\$180.00	Revise 30(b)(6) notice.
Clay J.	Pierce	5/10/2019	3.20	700.00	\$2,240.00	Emails, t/c's re discovery issues, draft discovery requests; weekly team call.
Justin M.	Ginter	5/10/2019	0.80	300.00	\$240.00	Teleconference and email correspondence with A. VanHouter regarding litigation issues and defendants' document production; email correspondence with M. Daly concerning status of litigation; draft and circulate initial disclosures for review.
Clay J.	Pierce	5/13/2019	2.10	700.00	\$1,470.00	Emails regarding Rule 26 voluntary disclosures; review materials produced by defendants.
Justin M.	Ginter	5/13/2019	1.00	300.00	\$300.00	Email correspondence with K. Deabler concerning initial disclosures; teleconference with G. Hartman concerning team call on Friday; confer with I.T. concerning data room configuration; teleconference with R. Carrillo; revise initial disclosures based upon team comments and revisions; serve initial disclosures; review and analyze Defendant's initial disclosures; send Defendants' initial disclosure documents to Jerry.
Andrew L.	Van Houter	5/13/2019	1.00	300.00	\$300.00	Analyze productions.
Clay J.	Pierce	5/14/2019	1.10	700.00	\$770.00	Review materials produced by defendants with voluntary disclosures.
Justin M.	Ginter	5/14/2019	0.40	300.00	\$120.00	Attention to case management deadlines; coordinate logistics of in-person team meeting.
Clay J.	Pierce	5/15/2019	2.50	700.00	\$1,750.00	Review materials produced by Plaintiffs; prepare for 5/16 meetings.
Justin M.	Ginter	5/15/2019	3.20	300.00	\$960.00	Review, analyze and annotate documents received from defendants initial disclosures and documents provided by former hearing officers; attention to logistics for in-person meeting; various communications concerning same.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.)						
Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Clay J.	Pierce	5/16/2019	5.20	700.00	\$3,640.00	Meetings with DBR team and co counsel regarding documents produced by defendants and former hearing officers, related merits and class discovery issues; prepare for and follow up to same.
Justin M.	Ginter	5/16/2019	5.20	300.00	\$1,560.00	Prepare for and attend DBR strategy meeting and team document review meeting.
Andrew L.	Van Houter	5/16/2019	2.00	300.00	\$600.00	Analyze productions.
Andrew L.	Van Houter	5/16/2019	2.00	300.00	\$600.00	Meeting with J. Ginter and C. Pierce regarding case status and prepare for same.
Andrew L.	Van Houter	5/16/2019	2.50	300.00	\$750.00	Meeting with New Economy and NCLEJ regarding case status and discovery.
Justin M.	Ginter	5/17/2019	0.20	300.00	\$60.00	Review TAB's substantive manual (pages were missing).
Clay J.	Pierce	5/20/2019	1.10	700.00	\$770.00	Review TAB documents.
Clay J.	Pierce	5/21/2019	1.80	700.00	\$1,260.00	Internal call; prepare to do list for team; emails regarding same; review hearing officer documents.
Justin M.	Ginter	5/21/2019	0.80	300.00	\$240.00	Plan and prepare for in-person meeting scheduled for May 22; teleconference with C. Pierce and A. Van Houter in preparation for in-person meeting with co-counsel; email correspondence with team enclosing list of action items.
Andrew L.	Van Houter	5/21/2019	0.50	300.00	\$150.00	Discussions with C. Pierce and J. Ginter regarding case status and follow up regarding same.
Clay J.	Pierce	5/22/2019	3.90	700.00	\$2,730.00	Meeting with co counsel regarding TAB documents, client files, and key strategy issues for merits and class certification.
Justin M.	Ginter	5/22/2019	6.40	300.00	\$1,920.00	Review Substantive Manual in advance of in-person team meeting; prepare for and attend in-person team meeting to review documents, discuss legal strategy and develop research topics; analyze documents received from hearing officers; attention to categories and issues to raise in interrogatories and 30(b)(6) deposition notice; review notes and draft summary of same related to topics and legal research issues raised during meeting; review notes concerning potential 30(b)(6) topics from K. Deabler.
Justin M.	Ginter	5/23/2019	3.40	300.00	\$1,020.00	Email correspondence with J. Hartman; draft interrogatories; draft summary of topics and issues raised at in-person; confirm configuration of data room and upload documents to same; confer with J. Hartman concerning same; review substantive manual for content and to determine whether an in-person meeting would be appropriate.
Andrew L.	Van Houter	5/23/2019	2.50	300.00	\$750.00	Analyze materials provided by TAB.
Clay J.	Pierce	5/24/2019	1.40	700.00	\$980.00	Comments to draft interrogatories and Rule 30(b)(6) deposition notice.
Justin M.	Ginter	5/24/2019	3.30	300.00	\$990.00	Continue to draft summary from in-person meetings by topic and legal research issues; review draft 30(b)(6) notice; revise and circulate draft interrogatories; evaluate next step action items.
Andrew L.	Van Houter	5/24/2019	3.00	300.00	\$900.00	Draft 30(b)(6) deposition notice.
Clay J.	Pierce	5/28/2019	1.20	700.00	\$840.00	Emails regarding comments to draft interrogatories, Rule 30(b)(6) deposition notice; review and respond to proposed edits.
Justin M.	Ginter	5/28/2019	1.10	300.00	\$330.00	Review summary of potential clients from New Economy; review client connect to ensure transfer and upload of docket documents; various email correspondence concerning interrogatories and 30(b)(6) notice; confer with C. Pierce regarding local rules concerning interrogatories; revise interrogatories and serve same.
Justin M.	Ginter	5/29/2019	1.40	300.00	\$420.00	Conduct legal research concerning 30(b)(6) deposition practices and requirements; email correspondence to C. Pierce and A. Van Houter concerning team call; attention to case management deadlines; draft email correspondence to the team regarding team conference call; review comments/proposed edits from R. Carrilo and S. Shin concerning 30(b)(6) notice; review email correspondence from C. Wilner concerning potential plaintiffs.
Andrew L.	Van Houter	5/29/2019	3.50	300.00	\$1,050.00	Research regarding ascertainability and class certification motion.
Clay J.	Pierce	5/30/2019	0.80	700.00	\$560.00	Emails regarding proposed adjournment of team call, status of discovery demands and responses, research related to same.
Justin M.	Ginter	5/30/2019	1.80	300.00	\$540.00	Email correspondence with team concerning scheduling team call; conduct research regarding taking multiple 30(b)(6) depositions.
Andrew L.	Van Houter	5/30/2019	0.30	300.00	\$90.00	Correspondence regarding 30(b)(6) deposition.
Clay J.	Pierce	5/31/2019	1.20	700.00	\$840.00	Weekly status call; prepare for and follow up to same.
Justin M.	Ginter	5/31/2019	1.30	300.00	\$390.00	Review and analyze email correspondence from M. Cohan concerning 30(b)(6) notice; email correspondence with C. Pierce and A. VanHouter concerning research related to multiple 30(b)(6) depositions; draft 30(b)(6) subpoena to New York DTF.
Justin M.	Ginter	6/4/2019	0.10	300.00	\$30.00	Plan and prepare for DBR internal team call.
Justin M.	Ginter	6/5/2019	1.80	300.00	\$540.00	Confer with C. Pierce and A. Van Houter concerning litigation strategy, action items and next steps; continue to draft and revise subpoena to New York Department of Taxation and Finance; develop list of case management deadlines, action items, research projects and other "to dos" and circulate to the team.
Andrew L.	Van Houter	6/5/2019	0.30	300.00	\$90.00	Teleconference with C. Pierce and J. Ginter regarding outstanding discovery tasks.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Clay J.	Pierce	6/6/2019	2.40	700.00	\$1,680.00	Weekly team call; review and comment on draft document request responses and objections, draft subpoena to DTF, and rule 30(b)(6) notice.
Justin M.	Ginter	6/6/2019	1.90	300.00	\$570.00	Circulate draft subpoena to NY DTF; prepare for and attend team teleconference regarding litigation strategy and open action items; revise action item list; email correspondence with J. Hartman; teleconference with A. Van Houter concerning draft 30(b)(6) notice to defendants; attention to revisions to notice; revise and circulate same to team.
Justin M.	Ginter	6/7/2019	0.70	300.00	\$210.00	Receive and review Defendants' Response to Plaintiff's First Request for Production of Documents; review New Economy Project's comments and revisions to 30(b)(6) notice to TAB; review TAB Memo concerning NOV Fee Change.
Justin M.	Ginter	6/10/2019	0.30	300.00	\$90.00	Confer with J. Hartman; email correspondence with J. Hartman concerning subpoena to NY Dep't of Taxation and Finance; prepare to incorporate team's edits to subpoena and serve same.
Justin M.	Ginter	6/11/2019	1.10	300.00	\$330.00	Investigate address for service of subpoena upon NY Dep't of Taxation and Finance; coordinate service; revise subpoena and notice of deposition topics, incorporating comments from team; confer with A. Van Houter concerning status and next steps.
Andrew L.	Van Houter	6/11/2019	0.70	300.00	\$210.00	Review draft subpoena to DTF.
Justin M.	Ginter	6/12/2019	0.40	300.00	\$120.00	Review deposition notices for named plaintiffs; email correspondence to opposing counsel concerning DTF subpoena; review emails concerning next team call and respond to same; review proof of service for DTF subpoena; email correspondence with opposing counsel; confer with A. Van Houter concerning deposition notices.
Andrew L.	Van Houter	6/13/2019	1.00	300.00	\$300.00	Team teleconference and prepare for same.
Justin M.	Ginter	6/14/2019	0.80	300.00	\$240.00	Attention to outstanding action items; review and analyze documents produced by opposing counsel.
Justin M.	Ginter	6/17/2019	1.10	300.00	\$330.00	Email correspondence concerning upcoming depositions; email correspondence with opposing counsel; review status of matter and maintain list of action items; review notes and issues concerning 30(b)(6) deposition and develop topics concerning same.
Andrew L.	Van Houter	6/17/2019	0.20	300.00	\$60.00	Correspondence regarding deposition scheduling.
Justin M.	Ginter	6/18/2019	0.10	300.00	\$30.00	Review email correspondence from R. Carrillo regarding notice of tax offsets and NOV's; review emails from C. Pierce and A. Van Houter regarding scheduling issues.
Andrew L.	Van Houter	6/18/2019	0.40	300.00	\$120.00	Correspondence regarding outstanding discovery issues.
Clay J.	Pierce	6/19/2019	0.70	700.00	\$490.00	Emails regarding Rule 30(b)(6) dep request to TAB.
Justin M.	Ginter	6/19/2019	0.30	300.00	\$90.00	Review issues and email correspondence concerning deposition scheduling.
Andrew L.	Van Houter	6/19/2019	1.00	300.00	\$300.00	Correspondence regarding depositions.
Clay J.	Pierce	6/20/2019	1.00	700.00	\$700.00	Review materials for client deposition preparation.
Justin M.	Ginter	6/20/2019	0.60	300.00	\$180.00	Prepare and update list of action items before team call; confer with A. Van Houter regarding outstanding issues; various conferences with DTF concerning subpoena; review deposition prep outline from New Economy; attend teleconference with C. Pierce and A. Van Houter; call with J. Hartman concerning work product issues; attention to topics for 30(b)(6) outline.
Andrew L.	Van Houter	6/20/2019	2.00	300.00	\$600.00	Team teleconference regarding depositions, prepare for same and analysis of outstanding issues.
Clay J.	Pierce	6/21/2019	1.10	700.00	\$770.00	Emails, telephone conferences regarding schedule for deposition of clients, selection of lawyer to defend client depositions; outline Rule 30(b)(6) topics.
Justin M.	Ginter	6/21/2019	0.80	300.00	\$240.00	Review and analyze email correspondence concerning work product issues; prepare to process payment for personal service to DTF; review emails concerning client availability; attention to issues concerning client connect and confer with S. Shin concerning same; briefly review draft documents requests and interrogatories; review documents for purposes of 30(b)(6) outline.
Andrew L.	Van Houter	6/21/2019	0.40	300.00	\$120.00	Correspondence regarding depositions and preparationn of same.
Justin M.	Ginter	6/23/2019	2.60	300.00	\$780.00	Draft and revise outline for 30(b)(6) deposition; review and revise interrogatory responses circulated by S. Shin; review deep dive analysis circulated by R. Carrillo; draft email to DBR team concerning interrogatory response; review J. Hartman's recommendation.
Clay J.	Pierce	6/24/2019	3.60	700.00	\$2,520.00	Meeting with client regarding deposition preparation; emails, conferences regarding discovery issues.
Justin M.	Ginter	6/24/2019	1.20	300.00	\$360.00	Draft email to DBR team concerning comments to revisions to interrogatories; draft email to team enclosing revisions to interrogatory responses; teleconference email correspondence with C. Pierce concerning 30(b)(6) deposition outline; email correspondence with C. Wilner concerning 30(b)(6) deposition outline topics; plan and prepare to call R. Carrillo concerning background check information; prepare to translate 30(b)(6) outline into working format for C. Pierce; analyze "key indicators" spreadsheet.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Andrew L.	Van Houter	6/24/2019	6.00	300.00	\$1,800.00	Meet with N. Robinson to prepare him for deposition and prepare for same.
Clay J.	Pierce	6/25/2019	3.50	700.00	\$2,450.00	Comments to draft document request responses; emails, telephone conferences regarding same; telephone conference with opposing Counsel regarding proposed protective order; review and revise draft 30(b)(6) deposition outline.
Justin M.	Ginter	6/25/2019	1.30	300.00	\$390.00	Draft and revise 30(b)(6) deposition outline; various email correspondence with team members in advance of discovery responses deadline, client deposition and 30(b)(6) deposition; email correspondence with R. Carrillo concerning information for client background checks; review background check reports; various email correspondence with A. Van Houter in preparation for deposition and other discovery issues; review additional email correspondence with team members addressing various disclosure and deposition issues; emails from and with opposing counsel; review A. Van Houter's revisions to responses to requests for documents; email correspondence with C. Wilner regarding 30(b)(6) deposition outline; review documents on Client Connect; attention to email correspondence concerning confidentiality and model confidentiality order; review documents produced by team in advance of Mr. Robinson's deposition.
Andrew L.	Van Houter	6/25/2019	0.70	300.00	\$210.00	Meet-and-confer with defendant's counsel regarding discovery.
Andrew L.	Van Houter	6/25/2019	2.50	300.00	\$750.00	Revise responses and objections to document requests.
Clay J.	Pierce	6/26/2019	2.70	700.00	\$1,890.00	Conference with A. Van Houter regarding Robinson deposition; review rough transcript of same; review and revise draft 30(b)(6) deposition outline for TAB corp representative.
Justin M.	Ginter	6/26/2019	1.90	300.00	\$570.00	Forward initial disclosures to A. Van Houter; revise 30(b)(6) outline; review various emails related to depositions and discovery, review email correspondence with opposing counsel; investigate missing email messages; email correspondence to A. Van Houter enclosing initial disclosures; review email correspondence from J. Hartman concerning revisions to objections and responses to requests for production of documents; review and analyze documents identified for production; send A. Van Houter notice of Deposition and address for deposition location; email correspondence with C. Wilner and S. Shin concerning preparations for 30(b)(6) deposition; email correspondence enclosing background check reports to New Economy; collect potential 30(b)(6) deposition exhibits for C. Pierce's review; plan and prepare for 30(b)(6) preparation session with C. Pierce in NYC office; confer with I.T. department concerning client connect issues; create folders and subfolders on Client Connect for S. Shin and R. Carrillo; coordinate administrative rights for New Economy for Client Connect; review deposition transcript of N. Robinson; various email correspondence; review agenda items for team call on June 27.
Andrew L.	Van Houter	6/26/2019	9.10	300.00	\$2,730.00	Prepare for and attend Robinson deposition and de-brief regarding same.
Andrew L.	Van Houter	6/26/2019	0.60	300.00	\$180.00	Correspondence with opposing counsel regarding discovery disputes.
Clay J.	Pierce	6/27/2019	1.70	700.00	\$1,190.00	Weekly team call; emails, telephone conferences with opposing counsel, DBR and co-plaintiffs counsel regarding discovery and research issues.
Andrew L.	Van Houter	6/27/2019	1.50	300.00	\$450.00	Revise discovery deficiency letter.
Clay J.	Pierce	6/28/2019	1.10	700.00	\$770.00	Emails regarding letter to opposing counsel regarding documents missing from defendants' production.
Justin M.	Ginter	6/28/2019	1.30	300.00	\$390.00	Review Defendants' interrogatory responses; email correspondence with C. Wilner concerning gaps in document production; review email concerning how TAB calculates interest; email correspondence from R. Carrillo concerning Mr. Evans's availability for deposition and preparation; draft meet and confer letter to opposing counsel; revise same, incorporating comments from A. Van Houter; revise letter to incorporate additional deficiency items raised by team members; prepare to serve letter upon opposing counsel; serve same; review email correspondence from S. Shin.
Justin M.	Ginter	6/30/2019	0.10	300.00	\$30.00	Review email from R. Carrillo concerning Mr. Evans's availability.
Clay J.	Pierce	7/1/2019	1.20	700.00	\$840.00	Emails regarding discovery schedule, adjournment of class briefing schedule, preparation for depositions; revise draft letter to court.
Justin M.	Ginter	7/1/2019	1.20	300.00	\$360.00	Review email correspondence from H. Hechtkopf concerning dates for Mr. Evans's deposition and the 30(b)(6) deposition; review email correspondence from team members concerning email to opposing counsel enclosing training materials exhibit; attend teleconference with C. Pierce; confer with A. Van Houter concerning outstanding issues; teleconference with DTF concerning status of affidavit; review letter motion extending discovery; review various email correspondence; review list of 30(b)(6) topics and documents from C. Wilner; review email concerning responses to document requests and draft email to DBR team with initial thoughts.
Andrew L.	Van Houter	7/1/2019	1.00	300.00	\$300.00	Draft and revise letter motion extending schedule.
Clay J.	Pierce	7/2/2019	2.10	700.00	\$1,470.00	Emails, telephone conferences regarding responses to document demands, deposition preparation, and motion to extend class certification schedule.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Justin M.	Ginter	7/2/2019	2.40	300.00	\$720.00	Emails scheduling in person work session in advance of 30(b)(6) deposition; confer with C. Pierce concerning logistics of same; attention to various email correspondence; email correspondence with K. Deabler and R. Carrillo concerning research assignments; review email correspondence from opposing counsel; confer with A. Van Houter regarding production of documents; review email from S. Shin concerning outstanding documents and notice to opposing counsel; attention to logistics for in-person meeting; prepare document production; various correspondence from team members.
Clay J.	Pierce	7/3/2019	1.80	700.00	\$1,260.00	Emails, telephone conference regarding production of client documents, objections to document requests.
Justin M.	Ginter	7/3/2019	2.60	300.00	\$780.00	Prepare proposed document production for C. Pierce's review; confer with DTF concerning affidavit; various email correspondence concerning document productions; attention to documents; review and revise responses to document requests; confer with S. Shin concerning documents in production set; review A. Van Houter's analysis regarding class briefing; review court's order granting extension to discovery and briefing deadlines; teleconference with group concerning production of criminal records; review defendants' supplemental document production; draft cover email to opposing counsel; attention to production issues; attention to issues with draft responses and objections; various email correspondence.
Andrew L.	Van Houter	7/3/2019	1.00	300.00	\$300.00	Finalize letter motion for extension of time and oversee filing of same
Andrew L.	Van Houter	7/3/2019	3.00	300.00	\$900.00	Research and draft email concerning class certification in perpetration for 30(b)(6) deposition.
Andrew L.	Van Houter	7/3/2019	2.00	300.00	\$600.00	Revise responses and objections to discovery requests.
Justin M.	Ginter	7/5/2019	0.80	300.00	\$240.00	Review email correspondence and attached notes and analysis; attention to case management dates and scheduling; email correspondence concerning deposition logistics; coordinate with stenographer; address issues related to videographer.
Justin M.	Ginter	7/7/2019	2.50	300.00	\$750.00	Review and analyze 30(b)(6) deposition outline notes from C. Wilner; analyze TAB production notes from C. Wilner; review and analyze additional questions for TAB raised by S. Shin; review notes and questions concerning Inquiry Unit manual raised by S. Shin; revise 30(b)(6) deposition outline.
Clay J.	Pierce	7/8/2019	4.30	700.00	\$3,010.00	Group meeting to prepare for 30(b)(6) deposition of TAB; emails, telephone conferences with opposing counsel regarding failure to produce documents, adjournment of deposition; mock cross examination of client in preparation for his deposition.
Justin M.	Ginter	7/8/2019	5.90	300.00	\$1,770.00	Prepare for 30(b)(6) preparation meeting; attend 30(b)(6) preparation meeting with co-counsel; confer with New York Division of Taxation and Finance concerning affidavit; evaluate outstanding document deficiencies and discuss whether to adjourn 30(b)(6) deposition; attend deposition preparation of Mr. Evans; confer with C. Pierce concerning document review for 30(b)(6) deposition preparation.
Andrew L.	Van Houter	7/8/2019	7.00	300.00	\$2,100.00	Meet with D. Evans to prepare for deposition and preparation.
Clay J.	Pierce	7/9/2019	3.00	700.00	\$2,100.00	Prepare for TAB 30(b)(6) deposition; conference with J. Ginter regarding same; review correspondence and newly produced documents from opposing counsel.
Justin M.	Ginter	7/9/2019	6.50	300.00	\$1,950.00	Attend 30(b)(6) deposition preparation and document review session with C. Pierce; prepare documents for review; analyze issues of matter to restructure and supplement outline; review email from opposing counsel concerning deficiencies; review and analyze defendants' supplemental production; annotate documents for C. Pierce's review; prepare deposition preparation binders for C. Pierce comprising relevant policy manuals, NOV files, and miscellaneous documents; review voicemail from J. Hartman and respond; review email correspondence from R. Carrillo concerning Mr. Evan's attempted robbery.
Justin M.	Ginter	7/10/2019	0.10	300.00	\$30.00	Attention to case management issues.
Justin M.	Ginter	7/11/2019	0.10	300.00	\$30.00	Review summary of Mr. Evans's deposition.
Andrew L.	Van Houter	7/11/2019	7.00	300.00	\$2,100.00	Prepare for and attend deposition of D. Evans.
Justin M.	Ginter	7/12/2019	0.20	300.00	\$60.00	Review email correspondence; upload defendants' production to client connect.
Justin M.	Ginter	7/15/2019	0.40	300.00	\$120.00	Review email correspondence from R. Carrillo concerning scheduling 30(b)(6); various email correspondence with DBR team concerning discovery and defendants' production; draft email to team concerning scheduling team call; review response to deficiency letter; review A. VanHouter's notes to production set.
Andrew L.	Van Houter	7/15/2019	1.00	300.00	\$300.00	Analyze production and correspondence regarding 30(b)(6).
Clay J.	Pierce	7/16/2019	1.50	700.00	\$1,050.00	Review new documents produced by defendants; emails, telephone conferences regarding Rule 30(b)(6) deposition.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Justin M.	Ginter	7/17/2019	0.40	300.00	\$120.00	Review email correspondence from New Economy Project concerning 30(b)(6) deposition preparation assistance; review email correspondence with opposing counsel concerning 30(b)(6) deposition; review hearing officer training binder documents.
Clay J.	Pierce	7/18/2019	1.50	700.00	\$1,050.00	Prepare for 30(b)(6) deposition.
Justin M.	Ginter	7/18/2019	0.60	300.00	\$180.00	Various email correspondence concerning document productions and 30(b)(6) preparation and logistics; draft and revise to-do list and circulate to group.
Clay J.	Pierce	7/19/2019	6.50	700.00	\$4,550.00	Prepare for rule 30(b)(6) deposition of NYTA; emails, telephone conferences re same.
Justin M.	Ginter	7/19/2019	3.90	300.00	\$1,170.00	Prepare binders of documents for C. Pierce's review; prepare same for delivery; review file for sample NOV; upload content to client connect portal; email opposing counsel concernign pre-2016 sample NOV; confer with C. Pierce concerning 30(b)(6) outline; draft and revise same.
Brenda	Diaz	7/19/2019	5.40	150.00	\$810.00	Review of documents produced by officers and compare to documents produced on behalf of A. VanHouter.
Justin M.	Ginter	7/20/2019	6.30	300.00	\$1,890.00	Review and analyze document productions; draft and revise 30(b)(6) outline.
Brenda	Diaz	7/20/2019	2.10	150.00	\$315.00	Review of documents produced by officers and compare to documents produced on behalf of A. VanHouter
Justin M.	Ginter	7/21/2019	4.20	300.00	\$1,260.00	Review and analyze document productions; integrate comments from team members into outline; draft and revise 30(b)(6) outline; proofread and revise and circulate to team.
Andrew L.	Van Houter	7/21/2019	1.50	300.00	\$450.00	Analyze productions to determine what is missing in preparation for 30(b)(6).
Clay J.	Pierce	7/22/2019	9.50	700.00	\$6,650.00	Prepare for TAB rule 30(b)(6) deposition of the NYC Transit Authority.
Justin M.	Ginter	7/22/2019	14.90	300.00	\$4,470.00	Prepare for 30(b)(6) deposition of Mary-Anne Maloney.
Clay J.	Pierce	7/23/2019	10.40	700.00	\$7,280.00	Deposition of Transit Authority's Rule 30(b)(6) witness; prepare for and follow up to same.
Clay J.	Pierce	7/24/2019	1.20	700.00	\$840.00	Emails, telephone conferences regarding case status, upcoming projects, settlement.
Clay J.	Pierce	7/25/2019	1.60	700.00	\$1,120.00	Weekly call with New Economy, NCLEJ; outline strategies for amendment of complaint, class certification, and merits discovery.
Clay J.	Pierce	7/26/2019	2.00	700.00	\$1,400.00	Review transcript of David Evans deposition.
Justin M.	Ginter	7/26/2019	0.80	300.00	\$240.00	Analyze notes from 30(b)(6) deposition and deposition transcript to develop list of additional documents to request from opposing counsel.
Justin M.	Ginter	7/29/2019	0.10	300.00	\$30.00	Review memo endorsement to R. Carrillo's motion to withdraw.
Clay J.	Pierce	7/31/2019	1.20	700.00	\$840.00	Outline new discovery requests; emails regarding 8/5 group meeting.
Justin M.	Ginter	7/31/2019	0.20	300.00	\$60.00	Email correspondence concerning location for potential client interview.
Clay J.	Pierce	8/1/2019	1.20	700.00	\$840.00	Emails with co-counsel regarding settlement meeting, upcoming projects; analysis of New Economy memo regarding potential settlement demands.
Justin M.	Ginter	8/1/2019	0.20	300.00	\$60.00	Email with team concerning scheduling of weekly teleconference; review New Economy's proposed changes to NYCTA policies and procedures.
Clay J.	Pierce	8/2/2019	0.70	700.00	\$490.00	Emails regarding August 5 meeting regarding settlement strategy.
Clay J.	Pierce	8/5/2019	2.50	700.00	\$1,750.00	Team meeting regarding settlement strategy.
Andrew L.	Van Houter	8/5/2019	6.30	300.00	\$1,890.00	Prepare for and attend team strategy session regarding proposed settlement terms.
Justin M.	Ginter	8/6/2019	0.10	300.00	\$30.00	Confer with DTF concerning outstanding discovery requests.
Justin M.	Ginter	8/7/2019	0.40	300.00	\$120.00	Forward 30(b)(6) deposition transcripts to co-counsel; review NCLEJ research memos.
Clay J.	Pierce	8/9/2019	1.00	700.00	\$700.00	Weekly team call.
Andrew L.	Van Houter	8/12/2019	2.00	300.00	\$600.00	Analyze 30(b)(6) transcript.
Clay J.	Pierce	8/13/2019	3.10	700.00	\$2,170.00	Review settlement and legal research memos from NCLEJ; review documents produced by Transit Authority.
Justin M.	Ginter	8/13/2019	0.20	300.00	\$60.00	Confer with A. Van Houter concerning outstanding action items.
Andrew L.	Van Houter	8/13/2019	1.50	300.00	\$450.00	Analyze 30(b)(6) transcript and potential areas for renewed discovery.
Clay J.	Pierce	8/14/2019	0.80	700.00	\$560.00	Conference with A. Van Houter regarding discovery issues.
Justin M.	Ginter	8/14/2019	0.30	300.00	\$90.00	Draft and revise agenda and action items in advance of team call.
Andrew L.	Van Houter	8/14/2019	0.40	300.00	\$120.00	Analyze issues related to class certification brief, amending the complaint and additional discovery.
Andrew L.	Van Houter	8/15/2019	0.50	300.00	\$150.00	Team teleconference concerning outstanding issues.
Justin M.	Ginter	8/16/2019	0.10	300.00	\$30.00	Email correspondence with Senior Attorney at DTF concerning outstanding subpoena.
Justin M.	Ginter	8/19/2019	0.20	300.00	\$60.00	Review affidavit from DTF; plan and prepare for internal DBR teleconference.
Clay J.	Pierce	8/20/2019	1.10	700.00	\$770.00	Emails regarding proposed adjournment of class certification briefing.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Justin M.	Ginter	8/20/2019	1.10	300.00	\$330.00	Review affidavit from DTF in response to subpoena and forward to team; internal litigation call with C. Pierce and A. Van Houter; plan and prepare for class certification strategy discussion with C. Wilner and C. Pierce; collect and send filed class certification motion documents to C. Pierce; prepare list of documents referenced in 30(b)(6) deposition but not produced in litigation and send to C. Pierce for review; plan and prepare to draft letter to opposing counsel concerning said documents; revise email to opposing counsel; various email correspondence concerning affidavit from DTF.
Andrew L.	Van Houter	8/20/2019	0.30	300.00	\$90.00	Discussions concerning schedule to amend complaint.
Justin M.	Ginter	8/21/2019	0.50	300.00	\$150.00	Attention to scheduling class certification strategy meeting with C. Pierce, C. Wilner, and A. VanHouter; draft letter to opposing counsel concerning documents referenced in deposition but not yet produced.
Clay J.	Pierce	8/22/2019	2.40	700.00	\$1,680.00	Telephone calls, emails with defense group regarding proposed calls, class certification issues; research regarding commonality and ascertainability issues.
Justin M.	Ginter	8/22/2019	0.80	300.00	\$240.00	Prepare for and join internal strategy meeting concerning class certification brief; various email correspondence concerning same; revise letter to opposing counsel and circulate to team; review research memorandum concerning notices of violations and tax refunds.
Andrew L.	Van Houter	8/22/2019	1.00	300.00	\$300.00	Discussions regarding class certification briefing and prepare for same; analyze draft deficiency letter.
Clay J.	Pierce	8/24/2019	0.40	700.00	\$280.00	Emails regarding stipulation adjourning class cert briefing schedule.
Clay J.	Pierce	8/26/2019	0.80	700.00	\$560.00	Emails regarding draft motion for adjournment of class briefing schedule.
Justin M.	Ginter	8/26/2019	0.90	300.00	\$270.00	Draft stipulation to extend class certification briefing dates; draft letter to J. Moses concerning same.
Andrew L.	Van Houter	8/26/2019	0.50	300.00	\$150.00	Attention to letter motion request for extension of time.
Clay J.	Pierce	8/27/2019	0.50	700.00	\$350.00	Emails regarding letter motion to court for adjournment of class briefing schedule.
Justin M.	Ginter	8/27/2019	1.10	300.00	\$330.00	Revise letter motion concerning extension of briefing schedule; various email correspondence concerning same; email draft to opposing counsel.
Clay J.	Pierce	8/28/2019	1.60	700.00	\$1,120.00	File letter seeking extension on class discovery briefing; analysis of potential amendment to complaint.
Justin M.	Ginter	8/28/2019	0.40	300.00	\$120.00	Teleconference with C. Pierce; file letter to J. Moses concerning extension to briefing schedule.
Clay J.	Pierce	8/29/2019	2.80	700.00	\$1,960.00	Weekly team call; finalize correspondence regarding documents missing from Transit Authority production; outline additional discovery requests.
Justin M.	Ginter	8/29/2019	0.70	300.00	\$210.00	Prepare list of action items and case management dates for team review; review order from J. Moses granting extension to briefing schedule; attention to calendaring team call for 9/3 at 4:00pm; review email correspondence from S. Shin concerning scheduling meeting with potential plaintiffs; draft and send deficiency letter to opposing counsel.
Clay J.	Pierce	9/3/2019	1.80	700.00	\$1,260.00	Telephone conferences with DBR team and plaintiffs' counsel regarding case status, strategy.
Justin M.	Ginter	9/3/2019	0.40	300.00	\$120.00	Attend internal DBR call with C. Pierce and A. Van Houter; plan and prepare to develop list of facts from 30(b)(6) deposition to supplement and amend complaint; confer with Sri Aryama concerning assistance in matter.
Andrew L.	Van Houter	9/3/2019	0.30	300.00	\$90.00	Discussions with C. Pierce regarding amended complaint and discovery.
Justin M.	Ginter	9/4/2019	1.80	300.00	\$540.00	Analyze 30(b)(6) deposition transcript and develop list of factual allegations to potentially use in amended complaint; review email correspondence with Helene concerning joint status letter.
Clay J.	Pierce	9/5/2019	1.10	700.00	\$770.00	Finalize and file joint status report letter; emails, telephone conferences regarding preparation of amended complaint, additional discovery requests.
Justin M.	Ginter	9/5/2019	0.80	300.00	\$240.00	Draft, revise and file joint status letter; email correspondence concerning same.
Andrew L.	Van Houter	9/5/2019	1.00	300.00	\$300.00	Team telephone call regarding case status.
Justin M.	Ginter	9/6/2019	0.10	300.00	\$30.00	Review court order concerning briefing schedule.
Clay J.	Pierce	9/9/2019	1.20	700.00	\$840.00	Outline amendments to complaint, proposed new discovery requests; emails regarding proposed settlement meeting.
Justin M.	Ginter	9/9/2019	0.50	300.00	\$150.00	Prepare list of action items in advance of team teleconference scheduled for September 10; review email correspondence from opposing counsel concerning settlement conference.
Clay J.	Pierce	9/10/2019	2.30	700.00	\$1,610.00	Weekly team call; conference with DBR team regarding new discovery requests, amended complaint; telephone conference with opposing counsel regarding proposed settlement meeting.
Justin M.	Ginter	9/10/2019	2.30	300.00	\$690.00	Analyze proposed changes to NYCTA policies and procedures; confer with C. Pierce and A. Van Houter concerning amended complaint; draft and revise amended complaint.
Andrew L.	Van Houter	9/10/2019	3.00	300.00	\$900.00	Meeting with C. Pierce regarding new discovery demands, amending complaint and case strategy and prepare for same.
Clay J.	Pierce	9/11/2019	1.50	700.00	\$1,050.00	Prepare for 9/12 teleconference with court.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.)						
Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Justin M.	Ginter	9/11/2019	3.20	300.00	\$960.00	Analyze deposition notes, 30(b)(6) deposition outline and various productions of documents and notes concerning same; draft and revise first amended complaint.
Andrew L.	Van Houter	9/11/2019	0.30	300.00	\$90.00	Emails with opposing counsel regarding court conference.
Clay J.	Pierce	9/12/2019	1.50	700.00	\$1,050.00	Conference call with Court regarding case status; prepare for and follow up to same.
Justin M.	Ginter	9/12/2019	1.50	300.00	\$450.00	Prepare documents for C. Pierce in advance of status conference with court; prepare agenda in advance of team teleconference; review settlement demands memo and prepare to draft settlement bullets; analyze docket updates by court; revise draft First Amended Complaint to incorporate comments by A. Van Houter.
Andrew L.	Van Houter	9/12/2019	0.50	300.00	\$150.00	Discussion with co-counsel regarding strategy moving forward regarding settlement and amendment.
Andrew L.	Van Houter	9/12/2019	2.30	300.00	\$690.00	Revise amended complaint.
Clay J.	Pierce	9/13/2019	2.30	700.00	\$1,610.00	Review amended complaint; emails, telephone conferences regarding same with DBR team.
Justin M.	Ginter	9/13/2019	0.30	300.00	\$90.00	Prepare redline of original complaint and draft first amended complaint for team review; review draft facts concerning potential new plaintiffs.
Andrew L.	Van Houter	9/13/2019	3.00	300.00	\$900.00	Revise amended complaint.
Justin M.	Ginter	9/16/2019	0.30	300.00	\$90.00	Review J. Hartman's comments to First Amended Complaint; review TAB Settlement demands; review email correspondence concerning of serving draft first amended complaint to Helene.
Andrew L.	Van Houter	9/16/2019	2.20	300.00	\$660.00	Draft settlement demands and correspondence with opposing counsel.
Justin M.	Ginter	9/18/2019	0.50	300.00	\$150.00	Review team comments to settlement position; email correspondence concerning same; email correspondence with A. Van Houter in advance of Thursday's team call; review additional comments.
Andrew L.	Van Houter	9/18/2019	7.10	300.00	\$2,130.00	Finalize complaint and settlement demands and communications regarding same.
Clay J.	Pierce	9/19/2019	1.30	700.00	\$910.00	Weekly team call; review and comment on draft settlement demand summary and amended complaint; emails, telephone conferences regarding same with A. Van Houter.
Justin M.	Ginter	9/19/2019	1.30	300.00	\$390.00	Prepare agenda and update case management deadlines; review comments to amended complaint; email correspondence concerning same; review email correspondence from opposing counsel concerning settlement conference; review revised settlement provisions outline; review revised First Amended Complaint.
Andrew L.	Van Houter	9/19/2019	5.00	300.00	\$1,500.00	Finalize settlement demands and amended complaint and correspondence with defendants' counsel regarding same.
Justin M.	Ginter	9/20/2019	0.40	300.00	\$120.00	Review comments and revised first amended complaint; review Hills decision.
Andrew L.	Van Houter	9/20/2019	0.70	300.00	\$210.00	Finalize amended complaint and correspondence with defense counsel regarding same.
Justin M.	Ginter	9/22/2019	0.10	300.00	\$30.00	Review email correspondence with opposing counsel and A. Van Houter concerning settlement meet-and-confer.
Clay J.	Pierce	9/23/2019	1.20	700.00	\$840.00	Emails regarding settlement meeting with defendants.
Justin M.	Ginter	9/23/2019	0.30	300.00	\$90.00	Review email correspondence concerning settlement meeting; attention to case management dates.
Andrew L.	Van Houter	9/23/2019	4.60	300.00	\$1,380.00	Participate and lead settlement conference meeting and prepare for same.
Justin M.	Ginter	9/25/2019	0.20	300.00	\$60.00	Confer with A. Van Houter concerning status and next steps; various email correspondence concerning client connect access for Karina Tefft.
Andrew L.	Van Houter	9/25/2019	0.30	300.00	\$90.00	Attention to outstanding tasks of draft letter to court and class certification brief.
Justin M.	Ginter	9/27/2019	1.00	300.00	\$300.00	Draft and revise joint status letter; revise same; circulate list of documents potentially relevant to class certification brief; emails circulating draft letter; review email correspondence with opposing counsel confirming consent to file amended complaint.
Justin M.	Ginter	9/30/2019	0.30	300.00	\$90.00	Email correspondence concerning joint status letter; review email correspondence concerning drafting revised class certification brief.
Clay J.	Pierce	10/1/2019	1.30	700.00	\$910.00	Emails, telephone conferences regarding class certification brief, proposed amendment of complaint.
Justin M.	Ginter	10/1/2019	0.40	300.00	\$120.00	Various email correspondence and calls with DBR team members regarding joint status letter; conduct research related to procedural rules; circulate class certification briefing.
Justin M.	Ginter	10/2/2019	0.30	300.00	\$90.00	Revise joint status letter and send to opposing counsel.
Justin M.	Ginter	10/3/2019	0.50	300.00	\$150.00	Various email correspondence concerning joint status letter; email correspondence concerning logistics for settlement meet-and-confer; review redlined client declarations.
Andrew L.	Van Houter	10/3/2019	1.50	300.00	\$450.00	Finalize letter to court and correspondence with team and opposing counsel regarding settlement, class certification and amended complaint.
Clay J.	Pierce	10/4/2019	1.10	700.00	\$770.00	Emails, telephone conferences regarding settlement negotiations and additional discovery requests.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Justin M.	Ginter	10/4/2019	0.30	300.00	\$90.00	Review email correspondence concerning client declarations; review email correspondence concerning meet-and-confer; coordinate dial-in logistics for status call.
Andrew L.	Van Houter	10/5/2019	0.50	300.00	\$150.00	Correspondence and analysis of outstanding tasks.
Clay J.	Pierce	10/7/2019	0.90	700.00	\$630.00	Emails, telephone conferences with DBR team regarding discovery requests, preparation for court status telephone conference.
Justin M.	Ginter	10/7/2019	0.70	300.00	\$210.00	Confer with A. Van Houter concerning status and next steps; teleconference with C. Pierce concerning same; attention to logistics for status conference; onboard Sri Aryama onto matter.
Andrew L.	Van Houter	10/7/2019	1.00	300.00	\$300.00	Attention to issues regarding outstanding discovery tasks.
Clay J.	Pierce	10/8/2019	1.10	700.00	\$770.00	Status teleconference with Court; prepare for and follow up to same.
Justin M.	Ginter	10/9/2019	0.20	300.00	\$60.00	Various email correspondence with team concerning action items; email correspondence with opposing counsel concerning meet-and-confer; coordinate logistics for meet-and-confer.
Justin M.	Ginter	10/10/2019	1.40	300.00	\$420.00	Attention to draft discovery; research issues concerning amended complaint; attention to meet-and-confer logistics; additional research; prepare summons; plan and prepare for meet-and-confer; draft summons.
Andrew L.	Van Houter	10/10/2019	2.00	300.00	\$600.00	Revise complaint and correspondence regarding research for same.
Andrew L.	Van Houter	10/10/2019	0.30	300.00	\$90.00	Teleconference with team regarding settlement and case strategy.
Vijayasri	Aryama	10/10/2019	3.90	300.00	\$1,170.00	Discussion with J. Ginter about issues to raise in supplemental discovery requests (0.1); conduct research of issues to raise in discovery requests (0.5); initial review and preparation of RFPs and review SDNY local rules to ensure compliance (0.9); draft RFPs (2.4).
Clay J.	Pierce	10/11/2019	0.70	700.00	\$490.00	Emails, telephone conference with J. Shields regarding anticipatory breach research.
Justin M.	Ginter	10/11/2019	2.10	300.00	\$630.00	Prepare for and attend meet-and-confer with opposing counsel; attend debrief teleconference with TAB team; review draft of plaintiffs' second request for production of documents; teleconference with A. Van Houter concerning same; finalize Foye summons; file complaint and request for summons.
Andrew L.	Van Houter	10/11/2019	0.30	300.00	\$90.00	Communications regarding filing of amended complaint and status of meet-and-confer.
Vijayasri	Aryama	10/11/2019	1.70	300.00	\$510.00	Editing RFPs in supplemental discovery request (1); complete drafting RFPs and email to J. Ginter (0.4); discussion with J. Ginter and A. Van Houter about RFP questions and issues (0.3).
Clay J.	Pierce	10/15/2019	1.10	700.00	\$770.00	Emails regarding settlement negotiations and draft discovery requests; review same.
Justin M.	Ginter	10/15/2019	0.90	300.00	\$270.00	Review client's signed declarations; attention to deposition notices; summarize meet-and-confer conference and counter-proposal; attention to additional discovery items; email correspondence with C. Pierce and A. Van Houter.
Vijayasri	Aryama	10/15/2019	0.90	300.00	\$270.00	Discussion with J. Ginter about document requests and deposition notices (0.1); draft deposition notices for 4 witnesses and email to J. Ginter for review (0.8).
Justin M.	Ginter	10/16/2019	2.00	300.00	\$600.00	Attention to issues concerning clerk docket entries; review and analyze class certification brief; plan and prepare to file brief in support of class certification; various teleconferences and email correspondence with opposing counsel; various email correspondence to DBR team; additional teleconference with opposing counsel; email summary to team; continue to onboard Sri Aryama; prepare summons and first amended complaint for service.
Andrew L.	Van Houter	10/16/2019	2.60	300.00	\$780.00	Analyze and revise class certification briefing.
Clay J.	Pierce	10/17/2019	3.40	700.00	\$2,380.00	Weekly team call; review and comment on revised motion for class certification; internal call regarding preparation of discovery.
Justin M.	Ginter	10/17/2019	1.00	300.00	\$300.00	Various email correspondence concerning outstanding action items; attend team call concerning onboarding S. Aryama; confer with S. Aryama concerning next steps; various email correspondence concerning class certification motion; review redline of class certification brief incorporating revisions by A. Van Houter; review confirmations of service of the First Amended Complaint; review draft declaration; review A. Van Houter's comments to additional discovery requests; review exhibits and prepare same for class certification motion.
Andrew L.	Van Houter	10/17/2019	0.30	300.00	\$90.00	Analyze comments to class certification brief.
Andrew L.	Van Houter	10/17/2019	0.30	300.00	\$90.00	Teleconference with C. Pierce, J. Ginter and S. Aryama regarding case status, strategy and outstanding tasks.
Andrew L.	Van Houter	10/17/2019	1.20	300.00	\$360.00	Revise class certification brief
Andrew L.	Van Houter	10/17/2019	0.40	300.00	\$120.00	Revise discovery requests
Clay J.	Pierce	10/18/2019	2.30	700.00	\$1,610.00	Finalize papers in support of renewed motion for summary judgment.
Justin M.	Ginter	10/18/2019	3.30	300.00	\$990.00	Draft and revise brief and accompanying documents and coordinate filing of same; review and analyze settlement counter-proposal.
Andrew L.	Van Houter	10/18/2019	0.50	300.00	\$150.00	Analyze defendant's counter-proposal for settlement and comment on same.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Andrew L.	Van Houter	10/18/2019	4.00	300.00	\$1,200.00	Attention to finalizing class certification brief, including numerous communications regarding same.
Vijayasri	Aryama	10/18/2019	9.90	300.00	\$2,970.00	Review, record cite check, edit, and prepare class certification brief for filing, including multiple discussions with J. Ginter.
Clay J.	Pierce	10/21/2019	0.80	700.00	\$560.00	Emails, telephone conference regarding settlement and discovery issues.
Justin M.	Ginter	10/21/2019	0.40	300.00	\$120.00	Analyze issues with S. Aryama concerning additional discovery requests; review prior email correspondence concerning same.
Clay J.	Pierce	10/23/2019	0.50	700.00	\$350.00	Call with G. Hartman regarding settlement issues.
Justin M.	Ginter	10/23/2019	0.50	300.00	\$150.00	Internal DBR teleconferences concerning settlement; various email correspondence concerning discovery.
Andrew L.	Van Houter	10/23/2019	1.30	300.00	\$390.00	Analysis of settlement offer and numerous communications concerning same.
Andrew L.	Van Houter	10/23/2019	1.00	300.00	\$300.00	Revise second requests for production.
Clay J.	Pierce	10/24/2019	1.40	700.00	\$980.00	Comments to draft discovery requests; weekly team call; follow up call with NCLEJ.
Andrew L.	Van Houter	10/24/2019	1.30	300.00	\$390.00	Revise second requests for production.
Andrew L.	Van Houter	10/24/2019	0.30	300.00	\$90.00	Teleconference with J. Hartman regarding case status and settlement strategy.
Clay J.	Pierce	10/25/2019	0.80	700.00	\$560.00	Emails, telephone conferences with DBR team, pro bono counsel regarding discovery demands.
Justin M.	Ginter	10/25/2019	0.50	300.00	\$150.00	Attention to issues concerning revised document requests; attention to issues concerning personal service of first amended complaint; review defendants' answer to first amended complaint; assist with revisions; email to counsel.
Andrew L.	Van Houter	10/25/2019	0.30	300.00	\$90.00	Revise discovery responses.
Andrew L.	Van Houter	10/25/2019	0.20	300.00	\$60.00	Analyze Defendants' answer to amended complaint.
Vijayasri	Aryama	10/25/2019	3.90	300.00	\$1,170.00	Call with team to discuss edits to draft supplemental discovery requests, discussions with A. Van Houter about required changes, edit draft discovery requests, and email to A. Van Houter for review (1.7); update discovery requests, based on multiple edits from inside and outside co-counsel (2.2).
Clay J.	Pierce	10/28/2019	0.70	700.00	\$490.00	Emails regarding second set of document requests, comments to same.
Justin M.	Ginter	10/28/2019	0.30	300.00	\$90.00	Confer with S. Aryama; review C. Pierce's revisions to draft document requests; email correspondence to team enclosing same; review revisions by J. Hartman.
Vijayasri	Aryama	10/28/2019	2.00	300.00	\$600.00	Review changes to documents suggested by outside counsel and discuss with A. Van Houter (0.6); finish editing and proofreading RFPs and email to opposing counsel (1.4).
Clay J.	Pierce	10/29/2019	0.70	700.00	\$490.00	Emails regarding continuing settlement negotiations.
Justin M.	Ginter	10/29/2019	0.30	300.00	\$90.00	Review email correspondence; attention to issues concerning additional discovery and deposition notices/subpoenas.
Andrew L.	Van Houter	10/29/2019	1.00	300.00	\$300.00	Revise deposition notices and subpoenas and develop strategy for same.
Justin M.	Ginter	10/30/2019	0.20	300.00	\$60.00	Review and analyze draft counter-proposal.
Clay J.	Pierce	10/31/2019	1.60	700.00	\$1,120.00	Emails regarding proposed negotiations with TAB, revisions to draft settlement counter-proposal.
Justin M.	Ginter	10/31/2019	0.70	300.00	\$210.00	Review outstanding comments to counterproposal; attend team teleconference; review various email correspondence; confer with S. Aryama on various discovery issues.
Andrew L.	Van Houter	10/31/2019	0.70	300.00	\$210.00	Participate and prepare for weekly team teleconference; numerous communications regarding further meeting.
Vijayasri	Aryama	10/31/2019	0.60	300.00	\$180.00	Discussions with A. Van Houter and J. Ginter about subpoenas and notices to prepare.
Clay J.	Pierce	11/1/2019	0.50	700.00	\$350.00	Emails, telephone conferences regarding settlement negotiations.
Justin M.	Ginter	11/1/2019	0.20	300.00	\$60.00	Confer with S. Aryama concerning notices and subpoenas.
Andrew L.	Van Houter	11/1/2019	1.00	300.00	\$300.00	Attention to deposition notices and subpoenas.
Vijayasri	Aryama	11/1/2019	3.40	300.00	\$1,020.00	Review relevant rules, prepare subpoenas and notices, and email to C. Pierce, A. Van Houter, and J. Ginter.
Clay J.	Pierce	11/4/2019	1.20	700.00	\$840.00	Review and comment on draft subpoenas, deposition notices.
Justin M.	Ginter	11/4/2019	0.20	300.00	\$60.00	Review email correspondence and revised discovery documents.
Andrew L.	Van Houter	11/4/2019	0.20	300.00	\$60.00	Revise deposition notices and subpoenas.
Vijayasri	Aryama	11/4/2019	1.40	300.00	\$420.00	Readjust all proposed deposition dates in various deposition notices and subpoenas, edit Exhibit A to Rule 30(b)(6) deposition subpoena, and email to the team for review.
Justin M.	Ginter	11/6/2019	0.20	300.00	\$60.00	Review summary of Angel Quiles facts by S. Shin.
Vijayasri	Aryama	11/6/2019	0.30	300.00	\$90.00	Edit Rule 30(b)(6) subpoena.
Clay J.	Pierce	11/7/2019	2.00	700.00	\$1,400.00	Meeting with plaintiffs' counsel regarding settlement counter proposal.
Vijayasri	Aryama	11/7/2019	0.90	300.00	\$270.00	Begin drafting settlement comparison chart (0.9).
Justin M.	Ginter	11/8/2019	0.30	300.00	\$90.00	Review revised Settlement Counter Offer document; review analysis by S. Aryama comparing the settlement provisions.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Vijayasri	Aryama	11/8/2019	3.70	300.00	\$1,110.00	Continue preparing comparison chart of multiple versions of settlement agreement points made between the parties (2.1); discussion with J. Ginter about case and various questions (0.6); incorporate new version of settlement points into comparison chart, based on document circulated by K. Deabler (1).
Andrew L.	Van Houter	11/13/2019	2.50	300.00	\$750.00	Numerous communications concerning case status and discovery; numerous communications with team regarding discovery; revise settlement proposal chart.
Vijayasri	Aryama	11/13/2019	1.40	300.00	\$420.00	Brief call with A. Van Houter and respond to his inquiry by email (0.1); meeting with A. Van Houter to discuss last edits to 3 deposition notices before sending to opposing counsel (0.3); cross-reference dates assigned for the 3 deposition notices and 7 deposition subpoenas and readjust selected dates for deposition notices to avoid clashing (0.8); draft email and serve notices on opposing counsel by email (0.2).
Justin M.	Ginter	11/14/2019	0.50	300.00	\$150.00	Review emails concerning meeting to discuss reply brief; review research memo analyze due process issues.
Vijayasri	Aryama	11/14/2019	4.60	300.00	\$1,380.00	Review and reorganize settlement negotiations comparison spreadsheet, comparing 3 different versions of settlement documents, per requested edits from A. Van Houter.
Justin M.	Ginter	11/15/2019	0.40	300.00	\$120.00	Review Defendants' response to Plaintiff's deficiency letter; review memorandum of law in support of opposition to motion to certify class.
Andrew L.	Van Houter	11/16/2019	1.00	300.00	\$300.00	Analyze Defendant's opposition to class certification and discovery letter.
Justin M.	Ginter	11/18/2019	0.50	300.00	\$150.00	Confer with S. Aryama concerning TAB's brief in opposition to class certification and next steps concerning reply brief; email correspondence with S. Aryama regarding same.
Andrew L.	Van Houter	11/18/2019	1.00	300.00	\$300.00	Analyze due process memo; teleconference with J. Hartman regarding same.
Justin M.	Ginter	11/19/2019	0.70	300.00	\$210.00	Review brief in opposition to motion to certify class in advance of team meeting.
Clay J.	Pierce	11/20/2019	2.20	700.00	\$1,540.00	Review brief opposing class certification; planning meeting with all plaintiffs' counsel regarding reply strategy, arguments.
Vijayasri	Aryama	11/20/2019	2.80	300.00	\$840.00	Discussion with J. Ginter about TAB litigation call, next steps on brief, and research issues (1.2); discussions with J. Ginter and A. Van Houter on research required for certification reply brief, and review of arguments raised in briefs (1.6).
Justin M.	Ginter	11/21/2019	0.10	300.00	\$30.00	Confer with S. Aryama concerning progress on commonality research.
Vijayasri	Aryama	11/21/2019	5.20	300.00	\$1,560.00	Discussion with A. Van Houter about research required for reply brief (0.1); discussion with J. Ginter about class certification brief research (0.5); review case law cited in opening class certification brief and opposition to class certification brief to determine issues to raise in reply brief (4.6).
Vijayasri	Aryama	11/22/2019	7.10	300.00	\$2,130.00	Review case law cited by opposing counsel in their opposition to class certification brief (0.5); discussion with A. Van Houter about how to approach commonality case law issues and research priorities (0.3); review Plaintiffs' opening class certification brief and Defendants' opposition to identify relevant arguments to address in reply brief, and begin initial case law research (5.4); begin drafting outline of points to raise in reply brief, specifically in commonality section (0.9).
Vijayasri	Aryama	11/23/2019	2.00	300.00	\$600.00	Review case law, complete outline of points to raise in commonality section of reply brief, and email to C. Pierce and A. Van Houter for review.
Vijayasri	Aryama	11/24/2019	6.60	300.00	\$1,980.00	Review case law and draft commonality section of class certification reply brief.
Andrew L.	Van Houter	11/25/2019	1.50	300.00	\$450.00	Revise commonality argument for class certification reply brief.
Vijayasri	Aryama	11/25/2019	1.90	300.00	\$570.00	Review edits from A. Van Houter to commonality section of class certification reply brief (0.1); incorporate necessary edits, review case law, perform cite check, and email revised version to A. Van Houter for review (1.5); respond to A. Van Houter's inquiries about case law (0.3).
Clay J.	Pierce	11/26/2019	1.10	700.00	\$770.00	Review and comment on draft class cert reply brief sections.
Justin M.	Ginter	11/26/2019	0.60	300.00	\$180.00	Review and analyze sections drafted by NCLEJ (ascertainability, state court remedy, and numerosity) in connection with reply brief in further support of class certification; review Defendants' responses to Plaintiffs' second request for Production of Documents; review draft commonality section; review and analyze draft typicality section by New Economy Project.
Andrew L.	Van Houter	11/26/2019	0.30	300.00	\$90.00	Attention to issues related to class certification reply brief.
Clay J.	Pierce	11/27/2019	0.80	700.00	\$560.00	Emails, telephone conferences regarding joint pre-conference status report; review and comment on same.
Justin M.	Ginter	11/27/2019	1.10	300.00	\$330.00	Draft and revise joint letter to J. Moses in advance of December 3 status conference; attention to emails concerning same.
Andrew L.	Van Houter	11/27/2019	0.70	300.00	\$210.00	Revise joint status letter and file same.
Vijayasri	Aryama	11/27/2019	0.40	300.00	\$120.00	Discussions with A. Van Houter and J. Ginter about pretrial conference issues and discovery conducted so far.
Clay J.	Pierce	12/2/2019	2.10	700.00	\$1,470.00	Review, revise, and draft preliminary statement for reply brief in further support of class certification.
Justin M.	Ginter	12/2/2019	0.20	300.00	\$60.00	Plan and prepare for status conference with J. Moses.
Andrew L.	Van Houter	12/2/2019	1.50	300.00	\$450.00	Revise class certification briefing.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Vijayasri	Aryama	12/2/2019	0.50	300.00	\$150.00	Review docket and discuss with J. Ginter in anticipation for conference call tomorrow (0.2); discussion with J. Ginter about reply brief due on Friday (0.3).
Clay J.	Pierce	12/3/2019	2.50	700.00	\$1,750.00	Status teleconference with Magistrate Judge Moses; prepare for and follow up to same; further revisions to class cert reply papers.
Andrew L.	Van Houter	12/3/2019	0.50	300.00	\$150.00	Telephone call with counsel for defendants regarding scheduling settlement and discovery meetings and follow up regarding same.
Vijayasri	Aryama	12/3/2019	1.50	300.00	\$450.00	Host telephonic joint status conference call with Judge Moses (0.8); summarize notes from call (0.5); run ChangePro reports to identify changes made to documentation from co-counsel and email to A. Van Houter and C. Pierce (0.2).
Clay J.	Pierce	12/4/2019	1.30	700.00	\$910.00	Emails, telephone conferences regarding further revisions to class certification reply papers.
Andrew L.	Van Houter	12/4/2019	0.50	300.00	\$150.00	Correspondence regarding service of subpoenas.
Justin M.	Ginter	12/5/2019	0.50	300.00	\$150.00	Review and analyze reply memorandum of law prior to filing deadline of December 6; review email correspondence concerning revisions to same.
Vijayasri	Aryama	12/5/2019	0.10	300.00	\$30.00	Discussion with J. Ginter to discuss reply brief on certification.
Clay J.	Pierce	12/6/2019	0.60	700.00	\$420.00	Emails regarding further comments to class certification reply papers.
Justin M.	Ginter	12/6/2019	0.40	300.00	\$120.00	Review final memorandum of law in support of motion for class certification; review emails concerning scheduling settlement conference and meet and confer; review NYC criminal court summons redesign.
Andrew L.	Van Houter	12/6/2019	1.50	300.00	\$450.00	Revise brief in support of class certification.
Clay J.	Pierce	12/9/2019	0.50	700.00	\$350.00	Emails regarding meet and confer regarding discovery disputes.
Andrew L.	Van Houter	12/9/2019	1.00	300.00	\$300.00	Numerous conversations concerning scheduling meet and confers.
Vijayasri	Aryama	12/9/2019	0.30	300.00	\$90.00	Discussion with A. Van Houter on court order related to discovery discussions with opposing counsel and upcoming settlement negotiations.
Clay J.	Pierce	12/10/2019	0.60	700.00	\$420.00	Emails regarding discovery dispute meet and confers and settlement meeting with defendants.
Andrew L.	Van Houter	12/11/2019	0.10	300.00	\$30.00	Communications concerning scheduling meet and confers.
Andrew L.	Van Houter	12/13/2019	2.00	300.00	\$600.00	Analyze discovery to identify deficiencies and draft summary regarding same; revise settlement position chart; communications with team concerning meet and confers.
Vijayasri	Aryama	12/13/2019	0.60	300.00	\$180.00	Review call notes, summarize, and send to A. Van Houter for review (0.6).
Clay J.	Pierce	12/16/2019	3.10	700.00	\$2,170.00	Settlement meeting and discovery meet and confer with opposing counsel; prepare for and follow up to same.
Clay J.	Pierce	12/17/2019	2.10	700.00	\$1,470.00	Revise proposed search terms for discovery; review defendants search terms.
Justin M.	Ginter	12/17/2019	0.40	300.00	\$120.00	Revise proposed search terms; plan and prepare to address subpoena service issues.
Andrew L.	Van Houter	12/17/2019	0.50	300.00	\$150.00	Revise search terms.
Clay J.	Pierce	12/18/2019	1.80	700.00	\$1,260.00	Emails, telephone conference regarding revisions to proposed search terms, counter to defendants' settlement proposal.
Andrew L.	Van Houter	12/18/2019	3.00	300.00	\$900.00	Revise search terms.
Clay J.	Pierce	12/19/2019	1.00	700.00	\$700.00	Weekly team call.
Clay J.	Pierce	12/19/2019	0.60	700.00	\$420.00	Comments to draft response to settlement counteroffer.
Justin M.	Ginter	12/19/2019	1.10	300.00	\$330.00	Review proposed edits to search terms; review response to defendants' settlement counteroffer; attention to issues concerning service of subpoenas.
Andrew L.	Van Houter	12/19/2019	2.40	300.00	\$720.00	Correspondence with defense counsel concerning search terms; revise settlement counter proposal; numerous correspondence concerning service of subpoenas.
Vijayasri	Aryama	12/19/2019	5.20	300.00	\$1,560.00	Discussion with J. Ginter about subpoenas (0.1); discussion with J. Ginter and A. Van Houter on possible edits to Exhibit A of Republic Parking System Rule 30(b)(6) subpoena (0.1); edit subpoenas, check appropriate rules, recalendar dates for each subpoena, and discuss entity address details with A. Van Houter (4.6); fix problems with subpoenas and email to all co-counsel and opposing counsel (0.4).
Clay J.	Pierce	12/20/2019	1.10	700.00	\$770.00	Comments to revised settlement statement; emails re same, revised email search terms.
Justin M.	Ginter	12/20/2019	0.50	300.00	\$150.00	Review revisions to settlement counterproposal; review issues related to search terms; attention to letter request for oral argument.
Vijayasri	Aryama	12/20/2019	2.50	300.00	\$750.00	Prepare cover letter with instructions and send out 5 subpoenas to Guaranteed Subpoena for service (1.1); draft and send letter request for oral argument to C. Pierce, A. Van Houter, and J. Ginter for review (0.6); make necessary edits to letter and work with B. Diaz to file letter (0.8).
Clay J.	Pierce	12/23/2019	0.80	700.00	\$560.00	Emails regarding service of discovery subpoenas
Justin M.	Ginter	12/23/2019	0.50	300.00	\$150.00	Attention to subpoena service issues.
Andrew L.	Van Houter	12/23/2019	1.00	300.00	\$300.00	Attention to issues concerning service of subpoenas.
Vijayasri	Aryama	12/23/2019	2.50	300.00	\$750.00	Research federal subpoena service requirements for corporations and email results to A. Van Houter and J. Ginter (2.4); notify A. Van Houter and J. Ginter about issues with subpoena service (0.1).

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Justin M.	Ginter	12/24/2019	0.30	300.00	\$90.00	Review email correspondence to opposing counsel enclosing response to defendants' settlement counteroffer; attention to issues concerning service of deposition notices.
Justin M.	Ginter	12/26/2019	0.10	300.00	\$30.00	Email correspondence concerning subpoena and service issues.
Andrew L.	Van Houter	12/26/2019	3.50	300.00	\$1,050.00	Draft response to Defendants concerning discovery and research regarding same.
Vijayasri	Aryama	12/26/2019	4.10	300.00	\$1,230.00	Discussion with A. Van Houter to ask pending subpoena questions and discuss next steps for subpoena service (0.4); email opposing counsel to follow up on request to obtain address information for certain individuals (0.1); prepare and send out 4 federal subpoenas with special instructions to Guaranteed Subpoena on how to serve them and call to confirm receipt (1); review library results on address information for certain individuals and reach out to A. Van Houter to answer his inquiry on address information (0.3); reviewing library research results for address information on K. Campbell and D. Nash, and discussion with A. Van Houter about results (0.5); draft email to A. Van Houter (0.1); research supporting case law to include in discovery issues letter to opposing counsel (1.7).
Clay J.	Pierce	12/27/2019	1.60	700.00	\$1,120.00	Emails regarding service of process issues for discovery subpoenas; review materials forwarded by V. Aryama; negotiations with opposing counsel regarding discovery disputes.
Justin M.	Ginter	12/27/2019	0.40	300.00	\$120.00	Various email correspondence concerning subpoenas, notices of depositions and deposition dates; evaluate service issues; review Defendants' Second Request for Production of Documents.
Andrew L.	Van Houter	12/27/2019	2.50	300.00	\$750.00	Numerous communications concerning discovery and subpoenas and research concerning same.
Vijayasri	Aryama	12/27/2019	1.40	300.00	\$420.00	Review case law research obtained for discovery dispute letter to opposing counsel, add necessary citations and details to letter, and email to C. Pierce and A. Van Houter for review.
Clay J.	Pierce	12/29/2019	1.10	700.00	\$770.00	Emails regarding discovery dispute issues; review materials forwarded by A. Van Houter.
Andrew L.	Van Houter	12/29/2019	2.30	300.00	\$690.00	Revise discovery response letter to Defendants; communications with defendants' counsel concerning discovery.
Clay J.	Pierce	12/30/2019	0.40	700.00	\$280.00	Status call with A. Van Houter.
Justin M.	Ginter	12/30/2019	0.70	300.00	\$210.00	Attention to various issues concerning service of subpoenas.
Andrew L.	Van Houter	12/30/2019	2.50	300.00	\$750.00	Numerous correspondences concerning discovery and service of subpoenas.
Brian P.	Morgan	1/2/2020	0.30	300.00	\$90.00	Inter-office conference with C. Pierce regarding status of matter and next steps.
Clay J.	Pierce	1/2/2020	3.50	700.00	\$2,450.00	Outline pre-conference status letter; emails, telephone conferences regarding discovery issues and disputes.
Justin M.	Ginter	1/2/2020	0.40	300.00	\$120.00	Attention to issues concerning discovery disputes; draft email to opposing counsel concerning same; review correspondence from opposing counsel concerning search terms.
Andrew L.	Van Houter	1/2/2020	0.60	300.00	\$180.00	Team teleconference concerning discovery and prepare for same.
Andrew L.	Van Houter	1/2/2020	1.50	300.00	\$450.00	Correspondence with Defendants' counsel concerning discovery issues and internal discussions concerning same.
Clay J.	Pierce	1/3/2020	2.90	700.00	\$2,030.00	Review and revise joint pre-conference status letter; emails, telephone conferences regarding proposed electronic discovery search terms.
Andrew L.	Van Houter	1/3/2020	5.00	300.00	\$1,500.00	Draft pre-motion conference letter and status letter and numerous communications concerning same and oversee filing of same.
Vijayasri	Aryama	1/3/2020	2.90	300.00	\$870.00	Review, update, and propose edits to prediscovery motion letter (1.7); make necessary edits to letter after its conversion to a joint status letter, review filing system rules, and file letter (1.2).
Andrew L.	Van Houter	1/5/2020	1.00	300.00	\$300.00	Analyze class certification briefing and create hearing preparation binder for same.
Andrew L.	Van Houter	1/5/2020	1.50	300.00	\$450.00	Revise draft pre-motion discovery letter motion.
Brian P.	Morgan	1/6/2020	0.50	300.00	\$150.00	Inter-office conferences with C. Pierce and A. Van Houter regarding status of the case and next steps.
Clay J.	Pierce	1/6/2020	3.00	700.00	\$2,100.00	Revise, finalize and file letter requesting pre-motion conference on discovery disputes; telephone conferences, emails regarding adjournment of status conference to Jan. 14; prepare for hearing on discovery disputes.
Justin M.	Ginter	1/6/2020	0.50	300.00	\$150.00	Review draft pre-motion discovery letter; confer with S. Aryama regarding same; review C. Pierce's revisions.
Andrew L.	Van Houter	1/6/2020	3.50	300.00	\$1,050.00	Revise letter to court regarding discovery and discussions regarding same.
Vijayasri	Aryama	1/6/2020	1.40	300.00	\$420.00	Incorporate letter edits and prepare exhibits to file with letter (0.6); edit letter, edit exhibits, and prepare for filing (0.8).
Clay J.	Pierce	1/7/2020	2.30	700.00	\$1,610.00	Emails, telephone conferences regarding pending discovery disputes; prepare for argument of same on 1/14 before magistrate.
Andrew L.	Van Houter	1/7/2020	2.00	300.00	\$600.00	Attention to deposition notices and numerous discussions with co-counsel.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Vijayasri	Aryama	1/7/2020	0.80	300.00	\$240.00	Discussion with J. Ginter regarding case developments (0.4); draft deposition notices for TAB hearing officers (0.3); edit deposition notices per A. Van Houter's edits and email to opposing counsel (0.1).
Clay J.	Pierce	1/8/2020	1.60	700.00	\$1,120.00	Review defendants' letter regarding pending discovery disputes; outline argument points on motion for class certification.
Andrew L.	Van Houter	1/8/2020	0.50	300.00	\$150.00	Correspondence with plaintiff's counsel regarding discovery.
Clay J.	Pierce	1/9/2020	1.00	700.00	\$700.00	Weekly call.
Clay J.	Pierce	1/10/2020	1.80	700.00	\$1,260.00	Emails regarding pending discovery disputes; draft outline for 1/14 status conference before Judge Moses.
Andrew L.	Van Houter	1/10/2020	2.50	300.00	\$750.00	Research in preparation for hearing.
Vijayasri	Aryama	1/10/2020	0.40	300.00	\$120.00	Discussion with A. Van Houter on case law research requirements to prepare for joint status conference.
Vijayasri	Aryama	1/11/2020	6.30	300.00	\$1,890.00	Research case law on deliberative process privilege and begin drafting research results.
Clay J.	Pierce	1/12/2020	2.70	700.00	\$1,890.00	Prepare for discovery/compliance conference.
Andrew L.	Van Houter	1/12/2020	4.50	300.00	\$1,350.00	Revise argument outline and research regarding same.
Vijayasri	Aryama	1/12/2020	5.30	300.00	\$1,590.00	Continue research, draft results, and send to A. Van Houter for review (4.1); review opposing counsel's case law and draft email with relevant points to A. Van Houter (1.2).
Clay J.	Pierce	1/13/2020	5.50	700.00	\$3,850.00	Prepare for argument on discovery disputes.
Justin M.	Ginter	1/13/2020	0.20	300.00	\$60.00	Assist S. Aryama with compiling information from prior document productions.
Vijayasri	Aryama	1/13/2020	2.00	300.00	\$600.00	Review responses and objections to Defendants' First RFPs to determine information already provided and how to respond to Defendants' Second RFPs (0.5); discussion with A. Van Houter about approach in responding to certain requests (0.1); discussion with J. Ginter to understand documents already produced (0.2); draft responses and objections to Second RFPs (1.2).
Clay J.	Pierce	1/14/2020	5.60	700.00	\$3,920.00	Status and discovery conference before Magistrate Judge Moses; prepare for and follow up to same.
Vijayasri	Aryama	1/14/2020	1.90	300.00	\$570.00	Finalize drafting responses and objections to Defendants' Second RFPs.
Andrew L.	Van Houter	1/15/2020	1.00	300.00	\$300.00	Attention to subpoena issues.
Vijayasri	Aryama	1/15/2020	1.30	300.00	\$390.00	Discussion with A. Van Houter about RFP responses and objections (0.3); input updates to responses and objections to Defendants' Second RFPs (0.7); discussions with A. Van Houter about contacting RPS counsel and next steps (0.3).
Clay J.	Pierce	1/16/2020	1.40	700.00	\$980.00	Weekly team call; follow up to same.
Vijayasri	Aryama	1/16/2020	2.00	300.00	\$600.00	Finalize drafting responses and objections to Defendants' Second RFPs and circulate to group for review.
Andrew L.	Van Houter	1/19/2020	0.50	300.00	\$150.00	Revise discovery responses.
Vijayasri	Aryama	1/20/2020	0.70	300.00	\$210.00	Edit responses and objections to Defendants' Second RFPs, per A. Van Houter's comments (0.6); draft email to K. Findikyan (counsel for Republic Parking System, LLC) to set up time to discuss deposition subpoena (0.1).
Clay J.	Pierce	1/21/2020	0.70	700.00	\$490.00	Review draft responses to document requests.
Andrew L.	Van Houter	1/21/2020	0.80	300.00	\$240.00	Teleconference with counsel for Republic Parking Systems regarding the subpoena and prepare and follow up regarding same.
Vijayasri	Aryama	1/21/2020	3.40	300.00	\$1,020.00	Prepare for call with K. Findikyan (Republic Parking System, LLC counsel) to notify her of intended deposition subpoena, including discussions with A. Van Houter and review of relevant documents (1.1); call with A. Van Houter and K. Findikyan (0.5); draft follow-up email to K. Findikyan with requested documents (0.1); edit responses and objections for Defendants' Second Requests for Production, based on team's edits (1.2); finalize responses and objections, based on final edits and adjustments (0.5).
Brian P.	Morgan	1/22/2020	0.30	300.00	\$90.00	Review responses and objections to Defendants' Second set of RFPs.
Vijayasri	Aryama	1/22/2020	0.80	300.00	\$240.00	Draft email to A. Van Houter to discuss upcoming case deadlines and next steps, in preparation for weekly call (0.4); review notes and draft email with open items to discuss during weekly call (0.4).
Clay J.	Pierce	1/23/2020	2.10	700.00	\$1,470.00	Weekly call; emails regarding objections to further document requests; comments to same.
Vijayasri	Aryama	1/23/2020	1.20	300.00	\$360.00	Update responses and objections to Defendants' Second Request for Production of Documents to incorporate new edits.
Vijayasri	Aryama	1/24/2020	0.30	300.00	\$90.00	Final review of responses and objections to Defendants' Requests for Production.
Andrew L.	Van Houter	1/27/2020	0.10	300.00	\$30.00	Correspondence concerning responses to discovery requests.
Vijayasri	Aryama	1/27/2020	0.50	300.00	\$150.00	Finalize last edits in responses and objections to Defendants' Requests for Production before sending to opposing counsel.
Vijayasri	Aryama	1/29/2020	0.10	300.00	\$30.00	Follow-up email to K. Findikyan (counsel for RPS, LLC) regarding subpoena service.
Brian P.	Morgan	1/30/2020	0.60	300.00	\$180.00	Inter-office conferences with A. Van Houter regarding deposition schedule; review search term hit report.
Clay J.	Pierce	1/30/2020	0.50	700.00	\$350.00	Weekly team call.
Andrew L.	Van Houter	1/30/2020	0.50	300.00	\$150.00	Correspondence with defense counsel regarding search terms.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Brian P.	Morgan	2/3/2020	1.00	300.00	\$300.00	Review hit report and analysis potential revisions to search terms; communicate with A. Van Houter regarding modifications to search terms.
Andrew L.	Van Houter	2/3/2020	2.50	300.00	\$750.00	Analyze defendants' proposed search terms and correspondence concerning same.
Justin M.	Ginter	2/4/2020	0.30	300.00	\$90.00	Assist Sri Aryama concerning drafting responses to defendants' interrogatories.
Clay J.	Pierce	2/5/2020	0.90	700.00	\$630.00	Emails regarding search term negotiations.
Vijayasri	Aryama	2/5/2020	1.20	300.00	\$360.00	Review interrogatories and determine potential issues (0.3); draft email to A. Van Houter identifying issues with Defendants' second set of interrogatories (0.3); discussion with A. Van Houter and draft multiple follow-up emails (0.6).
Andrew L.	Van Houter	2/7/2020	0.40	300.00	\$120.00	Revise joint status letter with court.
Vijayasri	Aryama	2/7/2020	0.10	300.00	\$30.00	Draft email to C. Pierce, A. Van Houter, and B. Morgan to discuss potential issues with Defendants' second set of interrogatories.
Andrew L.	Van Houter	2/11/2020	1.00	300.00	\$300.00	Analyze draft privilege log.
Vijayasri	Aryama	2/12/2020	0.80	300.00	\$240.00	Draft multiple emails and follow up with nonparty witness counsel on subpoena service issues.
Vijayasri	Aryama	2/14/2020	0.20	300.00	\$60.00	Discussion with K. Findikyan, counsel of nonparty witness Republic Parking System, LLC, to discuss subpoena service issues.
Clay J.	Pierce	2/17/2020	2.30	700.00	\$1,610.00	Emails regarding document production issues, analysis of potential summary judgment arguments.
Vijayasri	Aryama	2/17/2020	0.60	300.00	\$180.00	Draft multiple emails to A. Van Houter to discuss issues for nonparty subpoena service and email opposing counsel about anticipated discovery production schedule.
Andrew L.	Van Houter	2/19/2020	1.50	300.00	\$450.00	Analyze privilege log; attention to interrogatory responses.
Brian P.	Morgan	2/20/2020	0.20	300.00	\$60.00	Communicate with A. Van Houter regarding fact discovery deadline.
Andrew L.	Van Houter	2/20/2020	2.00	300.00	\$600.00	Attention to issues concerning discovery and multiple correspondence concerning same.
Vijayasri	Aryama	2/20/2020	7.30	300.00	\$2,190.00	Review and draft open items to address in coming weeks (1); discussion with A. Van Houter on open items in case (0.4); conduct case law research and review of relevant rules on contention interrogatories to determine potential responses to Defendants' Second Set of Interrogatories, including some discussions with A. Van Houter (5.9).
Clay J.	Pierce	2/21/2020	1.00	700.00	\$700.00	Telephone conference, emails regarding discovery issues, summary judgment preparation.
Vijayasri	Aryama	2/21/2020	4.90	300.00	\$1,470.00	Finalize research on contention interrogatories issue and review documents for potential interrogatory responses.
Clay J.	Pierce	2/24/2020	3.20	700.00	\$2,240.00	Meet with team regarding preparation of requests for admission, responses to interrogatories, and proposed extension of discovery schedule; telephone conferences with opposing counsel regarding extension; draft portions of requests for admission.
Andrew L.	Van Houter	2/24/2020	4.00	300.00	\$1,200.00	Analysis of interrogatory responses, requests for admission, privilege log, document productions and follow up regarding same.
Vijayasri	Aryama	2/24/2020	7.10	300.00	\$2,130.00	Review documents and begin drafting potential requests for admission (1.9); Meeting with C. Pierce and A. Van Houter to discuss discovery issues, including interrogatories and requests for admission (1.1); discussion with A. Van Houter about requests for admission (0.3); review pertinent case documents and draft requests for admission (3.8).
Brian P.	Morgan	2/25/2020	2.80	300.00	\$840.00	Prepare for and participate in moot of class cert argument.
Clay J.	Pierce	2/25/2020	4.00	700.00	\$2,800.00	Prepare requests for admission; conference regarding same with V. Aryama; prepare for and attend moot of class certification oral argument; follow up to same.
Andrew L.	Van Houter	2/25/2020	3.50	300.00	\$1,050.00	Attend class certification oral argument prep-session and prepare.
Vijayasri	Aryama	2/25/2020	11.00	300.00	\$3,300.00	Continue reviewing multiple documents and drafting requests for admission (8.8); meeting with C. Pierce to discuss progress with requests for admission (0.2); review and finalize requests for admission and send to C. Pierce and A. Van Houter for review (2).
Brian P.	Morgan	2/26/2020	0.90	300.00	\$270.00	Research grounds for objections to contention interrogatories.
Clay J.	Pierce	2/26/2020	2.30	700.00	\$1,610.00	Draft, revise interrogatory responses and requests for admission; emails regarding proposed extension of discovery schedule.
Andrew L.	Van Houter	2/26/2020	1.00	300.00	\$300.00	Attention to responses and objections to interrogatories; correspondence concerning subpoena.
Vijayasri	Aryama	2/26/2020	3.80	300.00	\$1,140.00	Begin preparing interrogatories (0.8); review local rules and judge rules on discovery extension requests (0.7); review docket to determine extension requests to date (0.3); review and edit letter (0.5); determine whether deposition location distance complies with federal rules (0.5); research subpoena rules (0.5); review and edit Republic Parking System subpoena (0.5).
Brian P.	Morgan	2/27/2020	1.00	300.00	\$300.00	Draft responses and objections to Plaintiffs' second set of interrogatories.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Clay J.	Pierce	2/27/2020	2.60	700.00	\$1,820.00	Draft, revise interrogatory responses and requests for admission; letter to court seeking extension of discovery schedule; negotiations regarding same with opposing counsel.
Andrew L.	Van Houter	2/27/2020	0.60	300.00	\$180.00	Revise responses to interrogatories and serve same.
Vijayasri	Aryama	2/27/2020	1.00	300.00	\$300.00	Review Republic Parking System deposition subpoena, finalize modifications, and serve electronically (1).
Brian P.	Morgan	2/28/2020	0.50	300.00	\$150.00	Review defendants' settlement counter-offer.
Clay J.	Pierce	2/28/2020	2.00	700.00	\$1,400.00	Second moot of class certification oral argument; prepare for and follow up to same; review settlement counter offer from defendants.
Clay J.	Pierce	3/2/2020	3.70	700.00	\$2,590.00	Oral argument on class certification; prepare for and follow up to same.
Andrew L.	Van Houter	3/2/2020	1.30	300.00	\$390.00	Numerous communications concerning class certification argument.
Vijayasri	Aryama	3/2/2020	0.60	300.00	\$180.00	Review deposition subpoenas and notices to determine discovery dates scheduled so far and draft email to C. Pierce and A. Van Houter with upcoming dates (0.5); meeting with A. Van Houter to discuss next steps (0.1).
Clay J.	Pierce	3/3/2020	0.60	700.00	\$420.00	Emails regarding revised class definition.
Brian P.	Morgan	3/4/2020	1.00	300.00	\$300.00	Participate in group call regarding post-argument letter briefing.
Vijayasri	Aryama	3/4/2020	1.70	300.00	\$510.00	Research class action certification issues.
Brian P.	Morgan	3/5/2020	0.40	300.00	\$120.00	Correspondence regarding proposed class definition.
Clay J.	Pierce	3/5/2020	1.20	700.00	\$840.00	Negotiations regarding revised class definition.
Clay J.	Pierce	3/6/2020	0.60	700.00	\$420.00	Emails regarding proposed revised class definition; review research regarding same.
Vijayasri	Aryama	3/6/2020	4.90	300.00	\$1,470.00	Research class certification standing issues, draft results, and email to C. Pierce, A. Van Houter, and B. Morgan.
Andrew L.	Van Houter	3/7/2020	0.30	300.00	\$90.00	Correspondence concerning research on class certification.
Vijayasri	Aryama	3/10/2020	1.50	300.00	\$450.00	Review transcript of oral argument for class certification to identify areas to address in existing class definition.
Vijayasri	Aryama	3/11/2020	1.40	300.00	\$420.00	Review of oral argument transcript to determine potential deficiencies in existing proposed class definition (0.5); draft email to A. Van Houter, C. Pierce, and B. Morgan with requested cases and summaries (0.9).
Clay J.	Pierce	3/12/2020	0.80	700.00	\$560.00	Weekly team call; meet and confer with opposition counsel regarding proposed revision to class definition.
Andrew L.	Van Houter	3/12/2020	1.00	300.00	\$300.00	Attention to document review and production and numerous communications concerning same.
Andrew L.	Van Houter	3/12/2020	3.00	300.00	\$900.00	Teleconference with defendants' counsel concerning class definition and prepare for and follow up concerning same; numerous communications concerning document review.
Vijayasri	Aryama	3/12/2020	5.20	300.00	\$1,560.00	Prepare for call with non-party subpoenaed witness' counsel (0.4); discussion with N. Tapert, counsel for Republic Parking System, LLC, regarding deposition subpoena and anticipated rescheduling (0.4); discussion with A. Van Houter and draft email to all counsel and N. Tapert to request proposed new deposition dates (0.5); review class certification briefs and case research and circulate information to litigation team (2.6); draft email to C. Pierce regarding research results (0.3); review case law research and draft proposed class definitions (1).
Brian P.	Morgan	3/13/2020	3.20	300.00	\$960.00	Review class certification cases and engage in conference calls with Plaintiffs team regarding revised class definition.
Clay J.	Pierce	3/13/2020	2.80	700.00	\$1,960.00	Discussions with FDBR team and co counsel regarding revised class definition; review case law regarding same.
Andrew L.	Van Houter	3/13/2020	2.00	300.00	\$600.00	Numerous teleconferences concerning amendment to class definition and research regarding same.
Vijayasri	Aryama	3/13/2020	4.50	300.00	\$1,350.00	Review case law and identify potential class definition issues (4); discussion with C. Pierce, A. Van Houter, and B. Morgan regarding research (0.5).
Andrew L.	Van Houter	3/15/2020	0.30	300.00	\$90.00	Correspondence concerning class certification briefing.
Vijayasri	Aryama	3/15/2020	1.00	300.00	\$300.00	Draft extension request letter and email to C. Pierce and A. Van Houter.
Andrew L.	Van Houter	3/16/2020	0.20	300.00	\$60.00	Correspondence concerning class certification.
Vijayasri	Aryama	3/16/2020	1.10	300.00	\$330.00	Edit and file extension request letter (0.9); draft email requests to set up Relativity access for S. Shin (co-counsel) (0.2).
Brian P.	Morgan	3/17/2020	0.50	300.00	\$150.00	Correspondence regarding class definition and discovery schedule.
Clay J.	Pierce	3/17/2020	2.50	700.00	\$1,750.00	Review class certification decisions; outline supplemental letter brief regarding motion for class certification; emails, telephone conferences regarding same.
Brian P.	Morgan	3/18/2020	0.30	300.00	\$90.00	Review correspondence relating to the revised class definition.
Clay J.	Pierce	3/18/2020	1.40	700.00	\$980.00	Emails regarding proposed revised class definition.
Vijayasri	Aryama	3/18/2020	2.70	300.00	\$810.00	Research case law and draft results for C. Pierce, A. Van Houter, and co-counsel.
Clay J.	Pierce	3/19/2020	0.60	700.00	\$420.00	Weekly team call.
Andrew L.	Van Houter	3/19/2020	3.50	300.00	\$1,050.00	Research regarding class certification and numerous conferences concerning same.
Brian P.	Morgan	3/20/2020	1.00	300.00	\$300.00	Review letter brief regarding revised class definition and correspondence relating to same.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Clay J.	Pierce	3/20/2020	3.50	700.00	\$2,450.00	Review, revise, and finalize letter to court re revised definition for proposed class; emails regarding same with FDBR team, co counsel.
Andrew L.	Van Houter	3/20/2020	2.50	300.00	\$750.00	Analyze and revise letter to court regarding class certification.
Vijayasri	Aryama	3/20/2020	4.60	300.00	\$1,380.00	Edit letter brief on revised class definition (0.7); incorporate team edits to letter and circulate for review (1); incorporate additional rounds of edits to letter (1); discussion with C. Pierce on letter and filing requirements (0.5); finalize letter and exhibit and file (1.4).
Andrew L.	Van Houter	3/25/2020	0.20	300.00	\$60.00	Analyze discovery letter from defendants' counsel.
Clay J.	Pierce	3/26/2020	0.80	700.00	\$560.00	Emails with FDBR team and co counsel re discovery issues.
Andrew L.	Van Houter	3/26/2020	3.50	300.00	\$1,050.00	Research for letter in response to defendants' discovery deficiency letter.
Vijayasri	Aryama	3/26/2020	0.70	300.00	\$210.00	Discussion with A. Van Houter and locate and send requested documents.
Clay J.	Pierce	3/27/2020	1.70	700.00	\$1,190.00	Team call regarding case status, response to defense letter re discovery disputes; comments to draft letter to defense counsel regarding same.
Justin M.	Ginter	3/27/2020	0.20	300.00	\$60.00	Assist Sri Aryama regarding discovery related issue.
Andrew L.	Van Houter	3/27/2020	2.30	300.00	\$690.00	Draft discovery letter response to Defendants.
Vijayasri	Aryama	3/27/2020	4.80	300.00	\$1,440.00	Discussion with A. Van Houter and review deposition transcripts for relevant citations to include in response letter (1.3); editing and drafting portions of response letter (1); initial research on requirements for valid interrogatory response objections (2.5).
Vijayasri	Aryama	3/28/2020	3.70	300.00	\$1,110.00	Research interrogatory responses and objections in light of response letter to opposing counsel.
Andrew L.	Van Houter	3/29/2020	0.30	300.00	\$90.00	Research regarding response to defendants' discovery letter.
Vijayasri	Aryama	3/29/2020	5.50	300.00	\$1,650.00	Discussion with A. Van Houter on research so far (0.1); additional modified research of case law on interrogatory response and objection rules (4.4); review selected cases and draft email with research results for A. Van Houter (1).
Clay J.	Pierce	3/30/2020	2.30	700.00	\$1,610.00	Edits to letter to opposition counsel regarding discovery disputes; emails, telephone conferences regarding same with co-counsel, A. Van Houter.
Andrew L.	Van Houter	3/30/2020	3.60	300.00	\$1,080.00	Revise response to discovery letter and research concerning same.
Vijayasri	Aryama	3/30/2020	2.30	300.00	\$690.00	Discussion with A. Van Houter on discovery responses letter (0.4); edit and cite check letter before circulating to litigation team (0.8); discussions with IT to prepare for review of Defendants' productions (0.2); draft email to A. Van Houter (0.1); review docket to confirm recent developments and draft email to A. Van Houter (0.4); review case law and discussion with A. Van Houter (0.4).
Clay J.	Pierce	3/31/2020	1.30	700.00	\$910.00	Emails regarding draft letter to opposition counsel regarding discovery disputes; emails, telephone conferences regarding same with co-counsel, A. Van Houter; emails regarding request for extension of defendants' time to respond to letter regarding revised class definition.
Andrew L.	Van Houter	3/31/2020	3.40	300.00	\$1,020.00	Revise discovery letter and research regarding same.
Vijayasri	Aryama	3/31/2020	2.70	300.00	\$810.00	Review Defendants' discovery responses (0.1); cite check and edit letter to Defendants regarding discovery responses (0.5); review Defendants' interrogatory responses and draft document highlighting deficiencies (2.1).
Andrew L.	Van Houter	4/1/2020	0.50	300.00	\$150.00	Analysis of documents for review and database concerning same.
Clay J.	Pierce	4/2/2020	1.20	700.00	\$840.00	Weekly team call; review document review protocol memo.
Andrew L.	Van Houter	4/2/2020	3.50	300.00	\$1,050.00	Team teleconference concerning document review and summary judgment outline and prepare and follow up regarding same; draft review protocol; teleconference with Tritura concerning document review tags.
Vijayasri	Aryama	4/2/2020	0.30	300.00	\$90.00	Discussion with A. Van Houter and J. Oriole on review tags and documents for review of Defendants' discovery productions.
Andrew L.	Van Houter	4/5/2020	0.10	300.00	\$30.00	Attention to strategy and scheduling issues.
Clay J.	Pierce	4/7/2020	0.50	700.00	\$350.00	Review defendants' letter opposing revised class definition.
Vijayasri	Aryama	4/7/2020	2.40	300.00	\$720.00	Review Defendants' responses to Plaintiffs' discovery requests to identify potential deficiencies to raise in follow-up discovery requests (0.8); analyze arguments in both parties' discovery dispute letters and determine further arguments and potential alternative class definitions (1.6).
Clay J.	Pierce	4/8/2020	0.80	700.00	\$560.00	Review and analysis of defendants' letter opposing proposed revised class definition; emails regarding 4/9 team call agenda.
Andrew L.	Van Houter	4/8/2020	0.30	300.00	\$90.00	Attention to discovery issues.
Vijayasri	Aryama	4/8/2020	1.10	300.00	\$330.00	Discussion with A. Van Houter (0.1); review Defendants' responses to Plaintiffs' various discovery requests to identify potential deficiencies to raise in follow-up discovery requests (1).
Vijayasri	Aryama	4/9/2020	3.90	300.00	\$1,170.00	Document review of Defendants' productions (1.7); discussion with C. Pierce (0.1); review and assign document batches to team (0.5); draft email to J. Ginter (0.1); review Defendants' discovery responses to identify potential deficiencies to raise in follow-up discovery requests (1.1); review and upload productions to system (0.4).
Andrew L.	Van Houter	4/13/2020	1.50	300.00	\$450.00	Analyze memorandum concerning outstanding discovery and summary judgment; teleconference with S. Aryama regarding same.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Andrew L.	Van Houter	4/13/2020	0.60	300.00	\$180.00	Correspondence with defendants' counsel concerning adjournment and correspondence with co-counsel concerning discovery issues.
Vijayasri	Aryama	4/13/2020	4.00	300.00	\$1,200.00	Review Defendants' discovery responses and determine deficiencies for potential future discovery requests (3.9); draft emails to J. Oriole (0.1).
Clay J.	Pierce	4/14/2020	1.20	700.00	\$840.00	Emails regarding proposed motion to extend discovery schedule; revisions to letter for same.
Andrew L.	Van Houter	4/14/2020	1.50	300.00	\$450.00	Numerous communications concerning discovery schedule and revise letter motion requesting extension of same.
Vijayasri	Aryama	4/14/2020	2.60	300.00	\$780.00	Review docket and calculate new deadlines for extension request letter (0.8); review prior court orders, draft letter to extend discovery deadlines, and draft email to A. Van Houter (0.8); review oral argument transcript (0.3); incorporate edits to letter (0.3); draft email to C. Pierce and A. Van Houter to answer inquiries (0.2); draft email to TAB litigation team with letter for review (0.1); draft email to opposing counsel to obtain consent for extension request (0.1).
Clay J.	Pierce	4/15/2020	0.60	700.00	\$420.00	Emails regarding proposed motion to extend discovery schedule, granting of same.
Vijayasri	Aryama	4/15/2020	0.10	300.00	\$30.00	Draft emails to opposing counsel to confirm consent before filing request to extend discovery deadlines.
Clay J.	Pierce	4/16/2020	0.60	700.00	\$420.00	Weekly team call.
Andrew L.	Van Houter	4/17/2020	0.30	300.00	\$90.00	Attention to discovery and scheduling issues.
Vijayasri	Aryama	4/17/2020	0.90	300.00	\$270.00	Review and update calendar with new discovery deadlines, per court order.
Clay J.	Pierce	4/21/2020	0.50	700.00	\$350.00	Emails regarding document review issues.
Andrew L.	Van Houter	4/21/2020	0.20	300.00	\$60.00	Correspondence concerning document review.
Vijayasri	Aryama	4/21/2020	1.80	300.00	\$540.00	Document review of Defendants' discovery productions.
Andrew L.	Van Houter	4/22/2020	0.10	300.00	\$30.00	Correspondence concerning case status and discovery issues.
Andrew L.	Van Houter	4/23/2020	0.50	300.00	\$150.00	Attention to issues concerning document review.
Vijayasri	Aryama	4/23/2020	4.80	300.00	\$1,440.00	Document review of Defendants' discovery productions.
Vijayasri	Aryama	4/24/2020	5.00	300.00	\$1,500.00	Document review of Defendants' discovery productions.
Vijayasri	Aryama	4/27/2020	1.40	300.00	\$420.00	Review and tag Defendants' document productions to identify potentially helpful documents for follow-up discovery requests and upcoming depositions.
Clay J.	Pierce	4/28/2020	1.20	700.00	\$840.00	Emails, telephone conferences regarding review of defendants' document production, privilege log, and upcoming depositions.
Andrew L.	Van Houter	4/28/2020	1.30	300.00	\$390.00	Attention to discovery issues and review documents.
Vijayasri	Aryama	4/28/2020	3.70	300.00	\$1,110.00	Review and tag Defendants' document productions to identify potentially helpful documents for follow-up discovery requests and upcoming depositions.
Andrew L.	Van Houter	4/29/2020	2.00	300.00	\$600.00	Analyze documents produced by TAB.
Andrew L.	Van Houter	4/29/2020	0.50	300.00	\$150.00	Teleconference with New Economy regarding privilege log.
Vijayasri	Aryama	4/29/2020	2.50	300.00	\$750.00	Review and tag Defendants' document productions to identify potentially helpful documents for follow-up discovery requests and upcoming depositions.
Clay J.	Pierce	4/30/2020	0.60	700.00	\$420.00	Emails regarding discovery issues.
Andrew L.	Van Houter	4/30/2020	1.10	300.00	\$330.00	Teleconference with co-counsel concerning case status and strategy and debrief regarding same.
Andrew L.	Van Houter	4/30/2020	4.60	300.00	\$1,380.00	Analyze documents produced by TAB and attention to other discovery issues.
Vijayasri	Aryama	4/30/2020	6.50	300.00	\$1,950.00	Review certain of Defendants' document productions (0.2); draft email to TAB litigation team with potentially helpful documents from Defendants' productions (0.1); review and tag Defendants' document productions to identify potentially helpful documents for follow-up discovery requests and upcoming depositions (6.2).
Andrew L.	Van Houter	5/1/2020	4.90	300.00	\$1,470.00	Analyze documents produced by TAB for assessment of relevance and usefulness to case.
Vijayasri	Aryama	5/1/2020	5.10	300.00	\$1,530.00	Review Defendants' document productions to identify potentially relevant documents for depositions and further discovery requests.
Clay J.	Pierce	5/4/2020	1.80	700.00	\$1,260.00	Team call regarding summary judgment motion arguments; prepare for same; review draft discovery deficiency letter.
Andrew L.	Van Houter	5/4/2020	3.50	300.00	\$1,050.00	Analyze summary judgment outline and research memorandum to develop discovery strategy and prepare for call regarding same.
Andrew L.	Van Houter	5/4/2020	0.50	300.00	\$150.00	Research regarding service of RPS employees.
Vijayasri	Aryama	5/4/2020	2.90	300.00	\$870.00	Review Defendants' responses to discovery requests and note potential deficiencies for follow-up discovery requests.
Brian P.	Morgan	5/5/2020	1.00	300.00	\$300.00	Research service options for federal subpoena in light of coronavirus.
Clay J.	Pierce	5/5/2020	0.80	700.00	\$560.00	Emails regarding deposition schedule and further research regarding class certification.
Andrew L.	Van Houter	5/5/2020	1.00	300.00	\$300.00	Email correspondence concerning privilege log issues and discovery deficiencies.
Vijayasri	Aryama	5/5/2020	0.20	300.00	\$60.00	Draft emails to A. Van Houter and Defendants' counsel.
Clay J.	Pierce	5/6/2020	0.50	700.00	\$350.00	Emails regarding privilege log issues, depositions of defendant witnesses.
Isaac T.R.	Smith	5/6/2020	3.30	300.00	\$990.00	Research regarding service of FRCP 45 subpoena and draft e-mail regarding the same for NYC TAB litigation

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Clay J.	Pierce	5/7/2020	1.10	700.00	\$770.00	Review case law re class certification forwarded by J. Hartman; emails regarding same.
Vijayasri	Aryama	5/7/2020	0.10	300.00	\$30.00	Draft emails to co-counsel.
Clay J.	Pierce	5/8/2020	0.70	700.00	\$490.00	Weekly team call.
Vijayasri	Aryama	5/8/2020	2.00	300.00	\$600.00	Review case law and pull relevant cases on due process concerns (1.4); draft emails to S. Shin to respond to her inquiry (0.6).
Vijayasri	Aryama	5/11/2020	4.50	300.00	\$1,350.00	Draft multiple emails, regarding Defendants' newest document production (0.6); review outstanding issues and prepare for team call (1); review list of discovery deficiencies and identify those to prioritize in deficiency letter (1.2); review documents to identify follow-up discovery areas(1.4); prepare and circulate notes on outstanding items (0.3).
Andrew L.	Van Houter	5/12/2020	0.10	300.00	\$30.00	Communications concerning document review and management.
Vijayasri	Aryama	5/12/2020	5.20	300.00	\$1,560.00	Review and prepare Defendants' older productions for consolidation with newer productions (0.5); discussions on older production issues (0.4); review Defendants' document productions to identify potentially relevant documents for depositions and further discovery requests. (4.3)
Brian P.	Morgan	5/13/2020	0.40	300.00	\$120.00	Participate in call with Drinker team regarding next steps.
Clay J.	Pierce	5/13/2020	1.20	700.00	\$840.00	Emails regarding discovery disputes; FBDR team call.
Andrew L.	Van Houter	5/13/2020	1.50	300.00	\$450.00	Analyze discovery deficiencies and draft comments regarding same and analyze issues related to case status and outstanding discovery.
Vijayasri	Aryama	5/13/2020	5.20	300.00	\$1,560.00	Review Defendants' document productions to identify potentially relevant documents for depositions and further discovery requests (3.5); review hot documents from Defendants' newest productions (1); discussion with C. Pierce, A. Van Houter, B. Morgan, and I. Smith on outstanding discovery concerns and next steps (0.5); prepare agenda reflecting outstanding discovery issues for weekly team call with co-counsel (0.2)
Clay J.	Pierce	5/14/2020	2.10	700.00	\$1,470.00	Weekly team meeting; emails, telephone conferences regarding discovery issues.
Andrew L.	Van Houter	5/14/2020	1.00	300.00	\$300.00	Numerous communications concerning discovery tasks.
Andrew L.	Van Houter	5/14/2020	0.60	300.00	\$180.00	Teleconference with RPS' counsel and follow up communications concerning same.
Vijayasri	Aryama	5/14/2020	3.30	300.00	\$990.00	Discussion with A. Van Houter (0.3); prepare deposition outline for M. Brody deposition (1.5); review relevant hot documents from document review (1.5).
Brian P.	Morgan	5/18/2020	1.80	300.00	\$540.00	Draft confidentiality agreement; participate in subcommittee call.
Clay J.	Pierce	5/18/2020	0.50	700.00	\$350.00	Emails regarding deposition schedule.
Andrew L.	Van Houter	5/18/2020	1.50	300.00	\$450.00	Teleconference concerning discovery and prepare and follow up regarding same.
Vijayasri	Aryama	5/18/2020	6.30	300.00	\$1,890.00	Review documents and draft M. Brody deposition outline (5.6); call with litigation team to discuss outstanding discovery issues and deposition preparation (0.7).
Justin M.	Ginter	5/19/2020	0.10	300.00	\$30.00	Confer with Sri Aryama concerning deposition-related issues.
Andrew L.	Van Houter	5/19/2020	1.50	300.00	\$450.00	Numerous correspondence concerning discovery and deposition preparation.
Vijayasri	Aryama	5/19/2020	7.90	300.00	\$2,370.00	Review of Defendants' document production to identify relevant documents for future discovery requests and upcoming deposition (0.6); review documents and prepare outline for M. Brody deposition (7.3).
Brian P.	Morgan	5/20/2020	1.00	300.00	\$300.00	Review documents to be produced, withheld, and withheld/logged.
Clay J.	Pierce	5/20/2020	0.60	700.00	\$420.00	Emails regarding deposition discovery.
Justin M.	Ginter	5/20/2020	0.10	300.00	\$30.00	Email correspondence with Sri Aryama concerning deposition preparation materials.
Andrew L.	Van Houter	5/20/2020	3.50	300.00	\$1,050.00	Attend training for remote deposition; numerous correspondence concerning deposition; revise discovery deficiency letter; numerous correspondence concerning discovery.
Vijayasri	Aryama	5/20/2020	10.50	300.00	\$3,150.00	Review documents and draft M. Brody deposition outline.
Isaac T.R.	Smith	5/20/2020	4.70	300.00	\$1,410.00	Draft deficiency letter for NYC TAB litigation
Brian P.	Morgan	5/21/2020	0.50	300.00	\$150.00	Draft subpoena to RPS and communicate with counsel for defendants and RPS regarding depositions of RPS employees.
Clay J.	Pierce	5/21/2020	1.10	700.00	\$770.00	Weekly team call; emails regarding declarations from new respondent witnesses.
Andrew L.	Van Houter	5/21/2020	1.40	300.00	\$420.00	Attention to discovery issues.
Vijayasri	Aryama	5/21/2020	9.70	300.00	\$2,910.00	Review documents and draft M. Brody deposition outline.
Clay J.	Pierce	5/22/2020	1.40	700.00	\$980.00	Emails regarding discovery disputes, declarations from incarcerated witnesses.
Andrew L.	Van Houter	5/22/2020	2.20	300.00	\$660.00	Revise discovery deficiency letter; numerous correspondence concerning discovery issues and deposition scheduling.
Andrew L.	Van Houter	5/22/2020	0.70	300.00	\$210.00	Correspondence concerning discovery deficiencies and depositions.
Vijayasri	Aryama	5/22/2020	8.40	300.00	\$2,520.00	Review documents and complete draft M. Brody deposition outline (5.4); prepare electronic binder of all materials and exhibits for use during deposition (2); review and respond to emails regarding various issues (1).
Andrew L.	Van Houter	5/24/2020	0.50	300.00	\$150.00	Correspondence concerning discovery issues.
Clay J.	Pierce	5/25/2020	1.90	700.00	\$1,330.00	Emails, telephone conferences regarding Brody deposition; review draft outline and proposed exhibits for same.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Andrew L.	Van Houter	5/25/2020	9.00	300.00	\$2,700.00	Analyze documents and prepare for Brody deposition and teleconference regarding same.
Vijayasri	Aryama	5/25/2020	5.50	300.00	\$1,650.00	Review and edit discovery deficiency letter and review sources for accuracy (2); review team comments to deposition outline (1); litigation team call on upcoming deposition for M. Brody (0.7); draft various emails to prepare for deposition (0.5); finalize and circulate deficiency letter for team review (1.3).
Brian P.	Morgan	5/26/2020	0.20	300.00	\$60.00	Communicate with counsel for RPS regarding subpoenas;
Clay J.	Pierce	5/26/2020	1.50	700.00	\$1,050.00	Negotiations regarding logistics for Brody deposition; review draft outline and proposed exhibits for same.
Andrew L.	Van Houter	5/26/2020	10.30	300.00	\$3,090.00	Prepare for Brody deposition.
Vijayasri	Aryama	5/26/2020	3.30	300.00	\$990.00	Draft multiple emails on outstanding discovery issues and deposition preparation (0.5); prepare redaction on production materials (0.4); prepare production and discuss with A. Van Houter (0.9); confirming details for next document production (0.8); draft emails to litigation team on upcoming deposition (0.7).
Brian P.	Morgan	5/27/2020	0.80	300.00	\$240.00	Participate in deposition platform training.
Clay J.	Pierce	5/27/2020	1.50	700.00	\$1,050.00	Review and comments on Brody deposition outline.
Andrew L.	Van Houter	5/27/2020	7.60	300.00	\$2,280.00	Prepare for Brody deposition.
Vijayasri	Aryama	5/27/2020	2.00	300.00	\$600.00	Review, prepare, rename, and upload all exhibits to remote deposition platform.
Clay J.	Pierce	5/28/2020	1.50	700.00	\$1,050.00	Emails, telephone conferences regarding Brody deposition, follow up to same.
Andrew L.	Van Houter	5/28/2020	8.00	300.00	\$2,400.00	Depose M. Brody and prepare for and debrief regarding same.
Brian P.	Morgan	5/29/2020	0.50	300.00	\$150.00	Address RPS discovery issues.
Clay J.	Pierce	5/29/2020	0.70	700.00	\$490.00	Emails regarding deposition, discovery disputes.
Vijayasri	Aryama	5/29/2020	0.60	300.00	\$180.00	Draft email to B. Morgan on RPS subpoena issues (0.3); review deposition transcript notes and draft email to R. Villagra, regarding potential follow-up discovery requests (0.3).
Brian P.	Morgan	6/1/2020	6.00	300.00	\$1,800.00	Review discovery responses, summary judgment outline and deficiency analysis; draft requests for admission.
Clay J.	Pierce	6/1/2020	1.30	700.00	\$910.00	Team call regarding discovery; review witness declarations; emails regarding outstanding projects.
Andrew L.	Van Houter	6/1/2020	1.00	300.00	\$300.00	Analysis of outstanding discovery tasks and case strategy.
Vijayasri	Aryama	6/1/2020	7.20	300.00	\$2,160.00	Draft emails on outstanding discovery requests and productions (0.5); discussion with A. Van Houter (0.2); draft email to litigation team outlining outstanding discovery items (0.5); review draft discovery documents (0.8); litigation team call (1.4); review prior discovery responses and prepare supplemental disclosures and interrogatory responses (2.3); draft email on privilege log (0.1); call to discuss remote deposition platform (0.4); research and review remote deposition information and available platforms (0.5); draft email to litigation team on remote deposition procedures and concerns (0.5).
Brian P.	Morgan	6/2/2020	5.50	300.00	\$1,650.00	Review documents in preparation for McDermott deposition; communicate with counsel for RPS regarding subpoena and deposition dates.
Clay J.	Pierce	6/2/2020	0.70	700.00	\$490.00	Emails regarding new document requests, challenge to TAB privilege claims.
Andrew L.	Van Houter	6/2/2020	2.50	300.00	\$750.00	Numerous correspondence concerning discovery issues and attention to same.
Vijayasri	Aryama	6/2/2020	3.90	300.00	\$1,170.00	Research and review rules on privilege and redaction to prepare document production (0.8); draft email to A. Van Houter (0.1); review batch of Defendants' document productions and identify relevant documents for potential discovery follow ups or depositions (2.5); review and finalize Plaintiffs' document production materials (0.5).
Brian P.	Morgan	6/3/2020	0.80	300.00	\$240.00	Communicate with counsel for RPS regarding subpoenas; revise protective order.
Andrew L.	Van Houter	6/3/2020	1.50	300.00	\$450.00	Revise discovery requests and numerous correspondence concerning discovery issues.
Vijayasri	Aryama	6/3/2020	3.60	300.00	\$1,080.00	Review and prepare supplemental disclosures and interrogatory responses (1); prepare, finalize, and produce Plaintiffs' document production (0.8); edit, finalize, and produce supplemental disclosures and interrogatory responses (1); communications with co-counsel on remote deposition issues (0.8).
Brian P.	Morgan	6/4/2020	6.00	300.00	\$1,800.00	Revise requests for admission; participate in meet and confer; draft potential interrogatories in lieu of McDermott deposition; communicate with co-counsel regarding McDermott deposition.
Clay J.	Pierce	6/4/2020	2.30	700.00	\$1,610.00	Weekly team call; meet and confer regarding motion for protective order regarding additional TAB depositions; emails regarding new written discovery demands; comments to same.
Andrew L.	Van Houter	6/4/2020	5.70	300.00	\$1,710.00	Numerous teleconferences with team concerning discovery issues and follow up communications; participate in meet-and-confer with defendants' counsel regarding discovery and follow up regarding same; analyze defendant's motion for a protective order.
Andrew L.	Van Houter	6/4/2020	1.10	300.00	\$330.00	Emails and discussions concerning RFAs and response to motion for protective order.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Vijayasri	Aryama	6/4/2020	3.60	300.00	\$1,080.00	Review deposition transcript to identify pertinent information to raise during meet and confer (0.4); prepare additional RFPs and incorporate edits (0.5); review Defendants' produced documents and draft additional proposed RFP (0.5); draft emails on discovery issues and on meet and confer issues (0.5); prepare second set of updated supplemental disclosures and interrogatory responses (0.5); draft email to B. Morgan (0.1); finalize and send supplemental disclosures and interrogatory responses to opposing counsel (0.4); review materials and prepare documents for client verification (0.7).
Isaac T.R.	Smith	6/4/2020	1.00	300.00	\$300.00	Call regarding David deposition meet-and-confer
Brian P.	Morgan	6/5/2020	1.50	300.00	\$450.00	Revise requests for admission; review letter to Court responding to motion for protective order.
Clay J.	Pierce	6/5/2020	1.80	700.00	\$1,260.00	Emails, telephone conferences regarding defendants' motion for protective order, refusal to produce witness; review court order re same; revisions to plaintiff's papers regarding same.
Andrew L.	Van Houter	6/5/2020	6.00	300.00	\$1,800.00	Draft opposition to motion to protective order and numerous communications regarding same; analyze reply brief; analyze court order; numerous follow up discussion in light of court order.
Vijayasri	Aryama	6/5/2020	6.40	300.00	\$1,920.00	Team discussion on opposition to protective order to bar depositions (0.1); initial research on protective order issues (1.2); discussion with I. Smith (0.1); research of record and other issues for opposition to protective order (4); draft emails (0.1); review court order denying protective order and draft email to opposing counsel (0.2); internal discussions on upcoming deposition (0.2); finalize and serve third set of requests for production to opposing counsel (0.5).
Isaac T.R.	Smith	6/5/2020	1.50	300.00	\$450.00	Research on evolving theories during discovery for letter brief for David deposition
Brian P.	Morgan	6/8/2020	0.90	300.00	\$270.00	Participate in group call regarding rogs, RFAs and RPS depositions.
Clay J.	Pierce	6/8/2020	1.80	700.00	\$1,260.00	Emails, telephone conferences regarding deposition scheduling, new written discovery demands.
Andrew L.	Van Houter	6/8/2020	1.80	300.00	\$540.00	Revise requests for admission and communications regarding same.
Brian P.	Morgan	6/9/2020	3.40	300.00	\$1,020.00	Draft subpoenas to former RPS employees and arrange service; review and revise rogs and RFAs.
Clay J.	Pierce	6/9/2020	1.20	700.00	\$840.00	Emails regarding revisions to new written discovery demands, service of same.
Andrew L.	Van Houter	6/9/2020	1.00	300.00	\$300.00	Revise discovery requests.
Vijayasri	Aryama	6/9/2020	3.60	300.00	\$1,080.00	Draft emails to A. Van Houter, discussing prior interrogatories served (0.3); edit interrogatories, check citations, and confirm local rules (1.7); update interrogatories to reflect team edits (0.4); review and edit requests for admission (1.2).
Clay J.	Pierce	6/12/2020	0.60	700.00	\$420.00	Emails regarding draft letter seeking depositions of senior hearing officers; review same.
Andrew L.	Van Houter	6/12/2020	0.50	300.00	\$150.00	Review and comment on draft email to opposing counsel and witness declarations.
Vijayasri	Aryama	6/12/2020	0.10	300.00	\$30.00	Draft email to S. Shin and A. Van Houter, regarding client verifications of supplemental interrogatory responses.
Clay J.	Pierce	6/15/2020	2.30	700.00	\$1,610.00	Team meeting re discovery issues; emails regarding deposition notices for senior hearing officers.
Vijayasri	Aryama	6/15/2020	0.90	300.00	\$270.00	Prepare and review two deposition notices (0.5); update deposition notices per discussion with A. Van Houter (0.4).
Brian P.	Morgan	6/16/2020	0.50	300.00	\$150.00	Correspondence / conferences re: RPS depositions.
Clay J.	Pierce	6/16/2020	2.10	700.00	\$1,470.00	Emails regarding deposition discovery issues; telephone conference with third party witness (Tracy Blaise) regarding subpoena.
Vijayasri	Aryama	6/16/2020	0.70	300.00	\$210.00	Prepare and send client verifications to supplemental interrogatory responses to opposing counsel.
Brian P.	Morgan	6/17/2020	2.00	300.00	\$600.00	Communications / negotiations re: RPS employees; communicate with Ms. Blaise regarding her deposition.
Clay J.	Pierce	6/17/2020	1.90	700.00	\$1,330.00	Emails regarding deposition discovery issues.
Vijayasri	Aryama	6/17/2020	1.30	300.00	\$390.00	Draft multiple emails (0.8); research on judicial immunity (0.5).
Clay J.	Pierce	6/18/2020	0.80	700.00	\$560.00	Emails, telephone conferences regarding David deposition, meet and confer regarding SHO discovery, research regarding same.
Vijayasri	Aryama	6/18/2020	5.20	300.00	\$1,560.00	Call with litigation team before D. David deposition (0.2); D. David deposition (2.5); debrief call after D. David deposition (0.7); review case law for upcoming meet and confer (0.6); review deposition transcript and pull excerpts for meet and confer (0.5); review deposition testimony (0.7);
Brian P.	Morgan	6/19/2020	0.30	300.00	\$90.00	Participate in conference call with counsel.
Clay J.	Pierce	6/19/2020	2.40	700.00	\$1,680.00	Meet and confer re request to depose senior hearing officers; review opposing counsel's letter to court regarding same; emails, telephone conferences regarding preparing a response.
Andrew L.	Van Houter	6/20/2020	1.00	300.00	\$300.00	Research concerning opposition to motion for protective order.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Andrew L.	Van Houter	6/21/2020	4.00	300.00	\$1,200.00	Revise opposition to motion for protective order.
Vijayasri	Aryama	6/21/2020	6.60	300.00	\$1,980.00	Review Defendants' protective order and initial draft response on hearing officer depositions and judicial immunity (1); research case law on judicial immunity from discovery (4); review relevant emails with opposing counsel to address in letter (0.8); initial research on open items in response letter (0.8).
Brian P.	Morgan	6/22/2020	0.70	300.00	\$210.00	Coordinate RPS depositions and communicate with counsel for RPS and TAB regarding same.
Clay J.	Pierce	6/22/2020	1.20	700.00	\$840.00	Emails, telephone conferences regarding response to defendants' letter seeking protective order against SHO depositions.
Andrew L.	Van Houter	6/22/2020	4.50	300.00	\$1,350.00	Finalize opposition to SHO letter motion for protective order and numerous communications regarding same.
Andrew L.	Van Houter	6/22/2020	0.30	300.00	\$90.00	Team teleconference concerning outstanding discovery tasks.
Vijayasri	Aryama	6/22/2020	5.30	300.00	\$1,590.00	Edit and circulate draft response letter to team (0.6); discussions with I. Smith on research for letter (0.5); further research on open areas of letter (1.6); review and incorporate team edits to letter (0.5); finalize and circulate updated letter to team (0.1); prepare exhibits for letter (0.8); modify and finalize exhibits (0.8); finalize exhibits, finalize letter, and circulate to team for filing (0.4).
Isaac T.R.	Smith	6/22/2020	2.30	300.00	\$690.00	Research regarding Rule 26(e) and Rule 37(c) and revision of motion in limine response brief
Brian P.	Morgan	6/23/2020	0.40	300.00	\$120.00	Discuss Quiles / White depositions with New Economy.
Clay J.	Pierce	6/23/2020	1.20	700.00	\$840.00	Emails regarding deposition discovery issues, discovery disputes with defendants.
Andrew L.	Van Houter	6/23/2020	0.20	300.00	\$60.00	Correspondence concerning depositions.
Brian P.	Morgan	6/24/2020	0.40	300.00	\$120.00	Review materials in advance of dep prep sessions.
Clay J.	Pierce	6/24/2020	0.90	700.00	\$630.00	Emails, telephone conferences regarding deposition discovery issues, challenge to defendants' privilege designations.
Andrew L.	Van Houter	6/24/2020	0.30	300.00	\$90.00	Numerous correspondence concerning discovery.
Vijayasri	Aryama	6/24/2020	1.60	300.00	\$480.00	Discussion with A. Van Houter (0.1); prepare productions for serving and client declarations for mailing (1); review productions and serve (0.5).
Brian P.	Morgan	6/25/2020	2.20	300.00	\$660.00	Prepare for and participate in dep prep calls,
Vijayasri	Aryama	6/26/2020	0.50	300.00	\$150.00	Initial research on responding to requests for admission issues.
Brian P.	Morgan	6/29/2020	1.00	300.00	\$300.00	Participate in group call; prepare for Quiles / White depositions.
Clay J.	Pierce	6/29/2020	0.70	700.00	\$490.00	Review draft deposition outlines.
Andrew L.	Van Houter	6/29/2020	0.70	300.00	\$210.00	Correspondence and teleconference concerning discovery issues.
Vijayasri	Aryama	6/29/2020	8.30	300.00	\$2,490.00	Research case law on how to respond to untimely-served requests for admission (3); draft email to C. Pierce, A. Van Houter, and B. Morgan on research findings (1); review research and prepare for team call (0.5); research additional issues per email from A. Van Houter (2.6); discussion with A. Van Houter (0.2); investigate details of prior document production to Defendants (0.7); prepare and resend already-produced documents to opposing counsel, per their request (0.3).
Brian P.	Morgan	6/30/2020	2.00	300.00	\$600.00	Defend deposition of Mr. Quiles.
Andrew L.	Van Houter	6/30/2020	0.50	300.00	\$150.00	Numerous correspondence concerning discovery.
Vijayasri	Aryama	6/30/2020	2.50	300.00	\$750.00	Research additional issues on untimely-served requests for admission and draft email in response to A. Van Houter.
Clay J.	Pierce	7/1/2020	0.20	700.00	\$140.00	Emails regarding inadvertent communication to opposing counsel.
Brian P.	Morgan	7/2/2020	1.50	300.00	\$450.00	Participate in O'Connor deposition.
Clay J.	Pierce	7/2/2020	0.70	700.00	\$490.00	Emails regarding deposition discovery.
Andrew L.	Van Houter	7/2/2020	1.50	300.00	\$450.00	Numerous communications concerning discovery issues and analyze court opinion on motion for protective order.
Vijayasri	Aryama	7/2/2020	1.10	300.00	\$330.00	Review all orders on docket to determine key deadlines (1); draft email to team on upcoming deadlines (0.1).
Brian P.	Morgan	7/6/2020	8.50	300.00	\$2,550.00	Review documents and draft outline in preparation for deposition of T. Blaise; participate in team call re: discovery issues.
Andrew L.	Van Houter	7/6/2020	0.50	300.00	\$150.00	Participate in team teleconference concerning discovery issues.
Andrew L.	Van Houter	7/6/2020	0.40	300.00	\$120.00	Analyze TAB's discovery responses and letter regarding privilege log.
Vijayasri	Aryama	7/6/2020	0.70	300.00	\$210.00	Review court order on hearing officer and senior hearing officer testimony (0.3); prepare upcoming document production (0.4).
Brian P.	Morgan	7/7/2020	2.00	300.00	\$600.00	Prepare for Blaise deposition.
Clay J.	Pierce	7/7/2020	1.60	700.00	\$1,120.00	Review draft deposition outline; emails regarding deposition discovery, upcoming meet and confer re discovery disputes.
Andrew L.	Van Houter	7/7/2020	1.00	300.00	\$300.00	Numerous communications concerning discovery.
Brian P.	Morgan	7/8/2020	5.30	300.00	\$1,590.00	Prepare for and participate in T. Blaise deposition; communicate with team regarding White deposition and responses to RFAs.
Clay J.	Pierce	7/8/2020	1.80	700.00	\$1,260.00	Emails concerning deposition discovery, disputes concerning privilege claims and late served RFA's.
Andrew L.	Van Houter	7/8/2020	1.00	300.00	\$300.00	Correspondence concerning discovery and participate in meet-and-confer concerning same.
Brian P.	Morgan	7/9/2020	1.40	300.00	\$420.00	Defend deposition of Mr. White.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Clay J.	Pierce	7/9/2020	0.70	700.00	\$490.00	Review defendants' responses to RFA's and interrogatories.
Brian P.	Morgan	7/10/2020	0.50	300.00	\$150.00	Correspondence regarding discovery.
Andrew L.	Van Houter	7/10/2020	0.50	300.00	\$150.00	Participate in team teleconference concerning discovery.
Vijayasri	Aryama	7/10/2020	4.00	300.00	\$1,200.00	Review, revise, and circulate research on requests for admissions to team (1); review Defendants' interrogatory responses and consolidate data before circulating to team (2); review case law and draft letter to opposing counsel on untimely discovery requests (1).
Andrew L.	Van Houter	7/17/2020	0.10	300.00	\$30.00	Revise letter to defendants concerning untimely requests for admission.
Vijayasri	Aryama	7/17/2020	1.20	300.00	\$360.00	Draft email to C. Pierce, A. Van Houter, and B. Morgan about letter to opposing counsel regarding Defendants' untimely requests for admission (0.5); incorporate edits to letter from C. Pierce and circulate to team for review (0.7).
Clay J.	Pierce	7/20/2020	0.90	700.00	\$630.00	Emails regarding draft letter to defendants re untimely RFAs; review stipulation regarding same; emails re preparation of answer to complaint.
Andrew L.	Van Houter	7/20/2020	0.70	300.00	\$210.00	Revise and send letter to defendants concerning untimely requests for admission.
Vijayasri	Aryama	7/20/2020	4.60	300.00	\$1,380.00	Review letter regarding Defendants' untimely requests for admission and draft edits (0.3); incorporate team edits to letter (0.6); research and prepare pre-motion letter on Defendants' untimely requests for admission to file with Court (3.7).
Brian P.	Morgan	7/21/2020	0.30	300.00	\$90.00	Review documents provided by Mr. Quiles and communicate with team regarding subpoena response.
Clay J.	Pierce	7/21/2020	1.20	700.00	\$840.00	Emails regarding summary judgment preparation; comments to draft letter motion for protective order with regards to RFAs.
Andrew L.	Van Houter	7/21/2020	0.50	300.00	\$150.00	Revise letter motion for a protective order.
Vijayasri	Aryama	7/21/2020	3.50	300.00	\$1,050.00	Obtain and review witness transcript to determine potential issues to raise for summary judgment motion (1.7); review, edit, and cite-check letter brief regarding discovery dispute (1); prepare exhibits for letter motion (0.3); finalize letter brief (0.5).
Brian P.	Morgan	7/22/2020	0.50	300.00	\$150.00	Review correspondence regarding RFAs.
Clay J.	Pierce	7/22/2020	1.70	700.00	\$1,190.00	Review letter from defendants regarding RFAs; revise letter motion regarding same; emails, telephone conferences regarding same.
Andrew L.	Van Houter	7/22/2020	2.70	300.00	\$810.00	Revise letter motion for a protective order.
Vijayasri	Aryama	7/22/2020	5.10	300.00	\$1,530.00	Review letter brief, incorporate multiple rounds of edits, and prepare exhibits (3); incorporate edits from C. Pierce and cite-check letter brief (2); review pertinent rules on letter motions (0.1).
Brian P.	Morgan	7/23/2020	1.30	300.00	\$390.00	Participate in group call; draft letter to counsel for defendants enclosing Quiles documents and execute service of same.
Clay J.	Pierce	7/23/2020	1.10	700.00	\$770.00	Comments to draft pre motion letter seeking protective order; weekly team call.
Vijayasri	Aryama	7/23/2020	5.20	300.00	\$1,560.00	Research additional issues on requests for admission and draft email to C. Pierce and A. Van Houter (2.5); additional research on local rules and requests for admission (0.8); review and incorporate multiple rounds of edits in letter brief (1.4); proofread final letter (0.5).
Clay J.	Pierce	7/24/2020	0.30	700.00	\$210.00	Emails regarding conference transcript.
Clay J.	Pierce	7/27/2020	1.30	700.00	\$910.00	Review defendants' letter opposing motion for protective order; emails regarding same.
Andrew L.	Van Houter	7/27/2020	0.30	300.00	\$90.00	Analyze Defendants' opposition to motion for protective order.
Clay J.	Pierce	7/28/2020	0.80	700.00	\$560.00	Review letter opposing protective order, draft reply to same.
Vijayasri	Aryama	7/28/2020	5.00	300.00	\$1,500.00	Research and distinguish cases for reply letter brief (3); draft reply letter brief (2).
Clay J.	Pierce	7/29/2020	1.10	700.00	\$770.00	Edits to reply letter in further support of motion for protective order.
Andrew L.	Van Houter	7/29/2020	3.00	300.00	\$900.00	Revise reply in support of letter motion and supervise filing of same; numerous correspondence concerning same.
Vijayasri	Aryama	7/29/2020	0.90	300.00	\$270.00	Incorporate multiple rounds of edits for reply letter brief.
Clay J.	Pierce	7/31/2020	0.60	700.00	\$420.00	Review decision granting motion for protective order; emails regarding same.
Andrew L.	Van Houter	7/31/2020	0.40	300.00	\$120.00	Analyze order regarding motion for protective order and communications regarding same.
Brenda	Diaz	7/31/2020	0.20	150.00	\$30.00	Attention to electronic pleading file management and distribution of same.
Vijayasri	Aryama	8/4/2020	1.60	300.00	\$480.00	Review deposition transcript of V. O'Connor and draft deposition summary to assist in summary judgment motion.
Vijayasri	Aryama	8/5/2020	3.10	300.00	\$930.00	Review court order regarding expert evidence deadline (0.1); review and summarize V. O'Connor deposition transcript (3).
Andrew L.	Van Houter	8/6/2020	1.00	300.00	\$300.00	Teleconference with co-counsel regarding strategy and prepare for and follow up regarding same.
Vijayasri	Aryama	8/6/2020	2.90	300.00	\$870.00	Review and summarize deposition transcript of V. O'Connor in anticipation of upcoming summary judgment motion.
Vijayasri	Aryama	8/7/2020	3.50	300.00	\$1,050.00	Review and summarize deposition transcript of V. O'Connor in anticipation of upcoming summary judgment motion.
Vijayasri	Aryama	8/10/2020	6.50	300.00	\$1,950.00	Review and draft outline of pertinent portions of V. O'Connor deposition testimony to prepare for upcoming summary judgment motion.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
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Vijayasri	Aryama	8/11/2020	8.00	300.00	\$2,400.00	Review and draft outline of pertinent portions of V. O'Connor deposition testimony to prepare for upcoming summary judgment motion.
Vijayasri	Aryama	8/11/2020	0.40	300.00	\$120.00	Review Plaintiffs' amended motion papers.
Vijayasri	Aryama	8/12/2020	0.90	300.00	\$270.00	Review and draft outline of pertinent portions of T. Blaise deposition testimony to prepare for upcoming summary judgment motion.
Vijayasri	Aryama	8/15/2020	3.70	300.00	\$1,110.00	Review and draft outline of pertinent portions of T. Blaise deposition testimony to prepare for upcoming summary judgment motion.
Vijayasri	Aryama	8/16/2020	2.40	300.00	\$720.00	Review and draft outline of pertinent portions of T. Blaise deposition testimony to prepare for upcoming summary judgment motion.
Vijayasri	Aryama	8/17/2020	2.90	300.00	\$870.00	Review and draft outline of pertinent portions of T. Blaise deposition testimony to prepare for upcoming summary judgment motion.
Vijayasri	Aryama	8/24/2020	1.50	300.00	\$450.00	Review summary judgment materials to identify relevant issues and questions for summary judgment motion.
Brian P.	Morgan	8/25/2020	0.80	300.00	\$240.00	Participate in TAB litigation weekly call.
Vijayasri	Aryama	8/25/2020	2.10	300.00	\$630.00	Review summary judgment materials to identify relevant issues and questions for summary judgment motion.
Vijayasri	Aryama	8/27/2020	1.20	300.00	\$360.00	Review TAB policy on vacating default judgments and initial research on certain summary judgment issues.
Vijayasri	Aryama	8/28/2020	0.70	300.00	\$210.00	Review of default judgment policy issues in preparation for summary judgment motion.
Brian P.	Morgan	8/31/2020	0.30	300.00	\$90.00	Review class certification report and recommendation.
Andrew L.	Van Houter	8/31/2020	1.00	300.00	\$300.00	Analyze report and recommendation on class certification.
Vijayasri	Aryama	8/31/2020	2.40	300.00	\$720.00	Research due process case law for upcoming summary judgment motion.
Andrew L.	Van Houter	9/1/2020	0.50	300.00	\$150.00	Teleconference concerning summary judgment strategy.
Vijayasri	Aryama	9/1/2020	0.10	300.00	\$30.00	Discussion with A. Van Houter regarding summary judgment motion research.
Clay J.	Pierce	9/2/2020	0.80	700.00	\$560.00	Emails, court orders regarding summary judgment motion, potential referral of same to magistrate.
Brian P.	Morgan	9/3/2020	0.30	300.00	\$90.00	Participate in weekly conference call.
Vijayasri	Aryama	9/3/2020	2.10	300.00	\$630.00	Research regarding responding to objections to magistrate judge report and recommendation.
Andrew L.	Van Houter	9/4/2020	0.70	300.00	\$210.00	Meet-and-confer regarding summary judgment and follow up regarding same.
Vijayasri	Aryama	9/4/2020	0.90	300.00	\$270.00	Draft email to A. Van Houter, regarding research on magistrate judge report and recommendation.
Vijayasri	Aryama	9/8/2020	4.60	300.00	\$1,380.00	Research and draft email to A. Van Houter, regarding magistrate judge report and recommendation consent issues (1.8); case law and evidence research for summary judgment motion (2.8).
Vijayasri	Aryama	9/9/2020	4.40	300.00	\$1,320.00	Case law research on due process issues for summary judgment motion.
Vijayasri	Aryama	9/10/2020	5.00	300.00	\$1,500.00	Case law research on due process issues for summary judgment motion (4.5); resolve various deposition invoice issues (0.5).
Andrew L.	Van Houter	9/11/2020	0.70	300.00	\$210.00	Teleconference with V. Aryama concerning summary judgment draft.
Vijayasri	Aryama	9/11/2020	4.70	300.00	\$1,410.00	Research and respond to R. Villagra email regarding her inquiries on deposition transcripts and errata sheets (0.5); case law and record research for summary judgment motion (4.2).
Clay J.	Pierce	9/14/2020	1.00	700.00	\$700.00	Telephone conference with A. Van Houter regarding Summary Judgment consent and preparation; review object to report and recommendation regarding class certification.
Andrew L.	Van Houter	9/14/2020	0.30	300.00	\$90.00	Correspondence concerning summary judgment and settlement.
Andrew L.	Van Houter	9/14/2020	0.70	300.00	\$210.00	Analyze defendants' objections to report and recommendation concerning class certification.
Vijayasri	Aryama	9/14/2020	5.60	300.00	\$1,680.00	Research and draft portions of summary judgment brief.
Andrew L.	Van Houter	9/15/2020	0.80	300.00	\$240.00	Analyze Second Circuit cases cited in Defendants' objections to class certification.
Vijayasri	Aryama	9/15/2020	5.00	300.00	\$1,500.00	Research and draft portions of summary judgment brief.
Clay J.	Pierce	9/16/2020	0.30	700.00	\$210.00	Telephone conference with A. Van Houter regarding settlement issues; review memo regarding same.
Andrew L.	Van Houter	9/16/2020	0.80	300.00	\$240.00	Analyze Defendants' settlement proposal and comment on same.
Vijayasri	Aryama	9/16/2020	5.70	300.00	\$1,710.00	Research and draft portions of summary judgment brief.
Clay J.	Pierce	9/17/2020	0.50	700.00	\$350.00	Weekly call.
Vijayasri	Aryama	9/17/2020	4.90	300.00	\$1,470.00	Research and draft portions of summary judgment brief (4.4); prepare and send client correspondences (0.5).
Vijayasri	Aryama	9/18/2020	4.90	300.00	\$1,470.00	Research and draft portions of summary judgment brief (4.7); resolve issues with client correspondences (0.2).
Vijayasri	Aryama	9/21/2020	1.40	300.00	\$420.00	Research on due process issues for summary judgment motion.
Andrew L.	Van Houter	9/22/2020	0.30	300.00	\$90.00	Correspondence concerning draft summary judgment brief.
Vijayasri	Aryama	9/22/2020	5.90	300.00	\$1,770.00	Review and draft summary judgment brief.
Clay J.	Pierce	9/23/2020	0.50	700.00	\$350.00	Emails regarding reply to objection to report and recommendation on class certification.
Andrew L.	Van Houter	9/23/2020	2.00	300.00	\$600.00	Revise response to Defendants' objections to class certification.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Vijayasri	Aryama	9/23/2020	8.00	300.00	\$2,400.00	Research and draft summary judgment brief.
Andrew L.	Van Houter	9/24/2020	0.40	300.00	\$120.00	Correspondence concerning summary judgment.
Vijayasri	Aryama	9/24/2020	4.00	300.00	\$1,200.00	Finalize and edit summary judgment brief.
Andrew L.	Van Houter	9/25/2020	1.50	300.00	\$450.00	Revise response to Defendants' objections to class certification.
Vijayasri	Aryama	9/25/2020	3.50	300.00	\$1,050.00	Review, edit, and cite check response to Defendants' objections to M.J. Moses' Report and Recommendation.
Clay J.	Pierce	9/28/2020	0.70	700.00	\$490.00	Review draft opposition to objection to class cert report and recommendation.
Vijayasri	Aryama	9/28/2020	1.50	300.00	\$450.00	Review and edit brief regarding response to Defendants' objections to Magistrate Judge Moses' report and recommendation to certify class (0.5); research regarding final issues before filing brief (1).
Vijayasri	Aryama	9/29/2020	1.50	300.00	\$450.00	Search for and review deposition exhibits for summary judgment motion (1.1); research regarding errata process for certain deponents (0.4).
Andrew L.	Van Houter	9/30/2020	1.40	300.00	\$420.00	Analyze decision on class certification; revise settlement counter-proposal.
Clay J.	Pierce	10/1/2020	0.70	700.00	\$490.00	Weekly team call; research regarding magistrate rules on summary judgment schedule.
Andrew L.	Van Houter	10/1/2020	3.40	300.00	\$1,020.00	revise summary judgment motion (3.4).
Vijayasri	Aryama	10/1/2020	0.60	300.00	\$180.00	Review latest settlement proposal (0.6).
Clay J.	Pierce	10/2/2020	0.40	700.00	\$280.00	Review final settlement proposal.
Andrew L.	Van Houter	10/2/2020	0.50	300.00	\$150.00	Revise settlement proposal and send same to opposing counsel.
Vijayasri	Aryama	10/2/2020	1.10	300.00	\$330.00	Review and edit summary judgment brief.
Andrew L.	Van Houter	10/5/2020	0.30	300.00	\$90.00	Numerous communications concerning settlement and summary judgment schedule.
Clay J.	Pierce	10/6/2020	1.10	700.00	\$770.00	Review draft sections of motion for summary judgment.
Andrew L.	Van Houter	10/6/2020	1.00	300.00	\$300.00	Draft and prepare letter motion setting forth briefing schedule.
Vijayasri	Aryama	10/6/2020	3.90	300.00	\$1,170.00	Review and edit summary judgment brief.
Clay J.	Pierce	10/7/2020	1.10	700.00	\$770.00	Comments to draft summary judgment section.
Andrew L.	Van Houter	10/7/2020	4.00	300.00	\$1,200.00	Revise brief in support of summary judgment.
Vijayasri	Aryama	10/7/2020	6.60	300.00	\$1,980.00	Discussion with A. Van Houter regarding summary judgment brief (0.1); additional case law research for summary judgment motion (4.5); review and draft edits to brief (2).
Brenda	Diaz	10/7/2020	0.60	150.00	\$90.00	Assist A. Van Houter with letter motion for extension and filing of same via ECF.
Vijayasri	Aryama	10/8/2020	5.00	300.00	\$1,500.00	Continue research on new summary judgment motion arguments and draft edits to brief.
Andrew L.	Van Houter	10/9/2020	0.50	300.00	\$150.00	Revise summary judgment brief.
Vijayasri	Aryama	10/9/2020	2.50	300.00	\$750.00	Research new case law for summary judgment, per discussion with A. Van Houter.
Vijayasri	Aryama	10/12/2020	4.70	300.00	\$1,410.00	Additional research for summary judgment brief on default judgment grounds in federal court.
Andrew L.	Van Houter	10/13/2020	0.30	300.00	\$90.00	Correspondence concerning discovery storage.
Vijayasri	Aryama	10/13/2020	2.00	300.00	\$600.00	Draft edits to summary judgment brief.
Vijayasri	Aryama	10/14/2020	0.70	300.00	\$210.00	Draft emails regarding ediscovery data preservation.
Andrew L.	Van Houter	10/21/2020	2.60	300.00	\$780.00	Revise summary judgment brief and statement of material facts.
Vijayasri	Aryama	10/21/2020	1.10	300.00	\$330.00	Review errata sheets from witnesses (0.6); review summary judgment brief (0.5).
Clay J.	Pierce	10/22/2020	0.90	700.00	\$630.00	Weekly strategy call; review and comment on draft summary judgment brief.
Vijayasri	Aryama	10/22/2020	1.50	300.00	\$450.00	Review and prepare exhibits and deposition transcript excerpts for summary judgment brief (1.5).
Vijayasri	Aryama	10/23/2020	3.50	300.00	\$1,050.00	Review and prepare exhibits and deposition transcript excerpts for summary judgment brief.
Vijayasri	Aryama	10/25/2020	0.80	300.00	\$240.00	Review and prepare exhibits and deposition transcript excerpts for summary judgment brief.
Clay J.	Pierce	10/26/2020	0.70	700.00	\$490.00	Review revised summary judgment brief; emails regarding same.
Andrew L.	Van Houter	10/26/2020	0.60	300.00	\$180.00	Revise summary judgment brief.
Vijayasri	Aryama	10/26/2020	5.20	300.00	\$1,560.00	Review and identify relevant portions of deposition transcripts to include in summary judgment motion.
Clay J.	Pierce	10/27/2020	1.30	700.00	\$910.00	Review and comment on draft summary judgment brief.
Andrew L.	Van Houter	10/27/2020	2.00	300.00	\$600.00	Revise draft brief for summary judgment and research concerning same.
Vijayasri	Aryama	10/27/2020	6.70	300.00	\$2,010.00	Review and identify relevant portions of deposition transcripts to include in summary judgment motion.
Andrew L.	Van Houter	10/28/2020	7.10	300.00	\$2,130.00	Continue revising summary judgment brief and research concerning same.
Vijayasri	Aryama	10/28/2020	6.60	300.00	\$1,980.00	Draft emails to A. Van Houter, regarding summary judgment motion (0.5); draft letter to court (0.5); discussions with A. Van Houter and research for summary judgment brief revisions (5.6).
Andrew L.	Van Houter	10/29/2020	0.70	300.00	\$210.00	Continue to revise summary judgment brief; revise letter motion requesting extension of page limits.
Vijayasri	Aryama	10/29/2020	2.70	300.00	\$810.00	Review and identify relevant portions of deposition transcripts to include in summary judgment motion.
Brian P.	Morgan	10/30/2020	0.40	300.00	\$120.00	Participate in group call re: SJ motion.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Clay J.	Pierce	10/30/2020	1.20	700.00	\$840.00	Review latest draft of summary judgment brief; emails with A. Van Houter regarding conference with plaintiffs' group.
Andrew L.	Van Houter	10/30/2020	0.30	300.00	\$90.00	Teleconference with co-counsel concerning draft summary judgment brief.
Vijayasri	Aryama	11/3/2020	0.30	300.00	\$90.00	Review and pull exhibits for summary judgment motion.
Clay J.	Pierce	11/4/2020	0.50	700.00	\$350.00	Emails regarding summary judgment issues.
Vijayasri	Aryama	11/4/2020	4.70	300.00	\$1,410.00	Review and pull exhibits for summary judgment motion.
Andrew L.	Van Houter	11/5/2020	0.50	300.00	\$150.00	Team teleconference concerning draft summary judgment motion.
Vijayasri	Aryama	11/5/2020	7.50	300.00	\$2,250.00	Review and pull deposition transcript excerpts and exhibits for statement of material facts for summary judgment motion (7.5).
Clay J.	Pierce	11/6/2020	0.50	700.00	\$350.00	Emails, telephone conferences regarding revisions to summary judgment papers.
Vijayasri	Aryama	11/6/2020	2.00	300.00	\$600.00	Review and pull deposition transcript excerpts and exhibits for statement of material facts for summary judgment motion.
Andrew L.	Van Houter	11/7/2020	0.70	300.00	\$210.00	Emails and teleconference concerning compilation of summary judgment record.
Vijayasri	Aryama	11/7/2020	4.40	300.00	\$1,320.00	Review and pull deposition transcript excerpts and exhibits for statement of material facts for summary judgment motion.
Vijayasri	Aryama	11/8/2020	9.20	300.00	\$2,760.00	Review and pull deposition transcript excerpts and exhibits for statement of material facts for summary judgment motion and draft accompanying attorney declaration.
Clay J.	Pierce	11/9/2020	1.80	700.00	\$1,260.00	Emails regarding summary judgment motion; comments to and finalization of same.
Andrew L.	Van Houter	11/9/2020	3.00	300.00	\$900.00	Revise statement of material facts for summary judgment and teleconferences concerning finalizing motion.
Andrew L.	Van Houter	11/9/2020	4.60	300.00	\$1,380.00	Analyze exhibits for summary judgment and prepare record and numerous communications concerning same.
Andrew L.	Van Houter	11/9/2020	0.60	300.00	\$180.00	Further discussions with V. Aryama regarding finalizing summary judgment record.
Vijayasri	Aryama	11/9/2020	14.90	300.00	\$4,470.00	Review and pull deposition transcript excerpts and exhibits for statement of material facts for summary judgment motion and draft accompanying attorney declaration (13.6); discussion with outside counsel concerning summary judgment motion (0.3); review and edit statement of material facts (1).
Clay J.	Pierce	11/10/2020	0.70	700.00	\$490.00	Comments to summary judgment brief; emails regarding checking factual citations.
Andrew L.	Van Houter	11/10/2020	7.50	300.00	\$2,250.00	Cite check statement of material facts and numerous communications concerning same; attention to finalizing documents for filing and numerous communications regarding same.
Vijayasri	Aryama	11/10/2020	17.30	300.00	\$5,190.00	Review and pull deposition transcript excerpts and exhibits for statement of material facts for summary judgment motion and draft accompanying attorney declaration.
Brenda	Diaz	11/10/2020	0.90	150.00	\$135.00	Assist with deposition excerpts to be combined for SDNY filing tomorrow.
Isaac T.R.	Smith	11/10/2020	2.80	300.00	\$840.00	Cite check motion for summary judgment brief
Andrew L.	Van Houter	11/11/2020	3.00	300.00	\$900.00	Finalize brief and exhibits for filing; analyze Defendants' motion for summary judgment and statement of material facts.
Vijayasri	Aryama	11/11/2020	7.80	300.00	\$2,340.00	Edit attorney declaration and prepare exhibits for upload (2.8); review exhibits and declaration to ensure correct documents and citations (1.7); Review and finalize statement of material facts, attorney declaration, and last exhibits (3.1); discussions with A. Van Houter regarding last issues with exhibits (0.2).
Clay J.	Pierce	11/13/2020	1.30	700.00	\$910.00	Emails regarding finalization and filing of summary judgment motion.
Andrew L.	Van Houter	11/20/2020	0.10	300.00	\$30.00	Correspondence concerning opposition to summary judgment.
Brian P.	Morgan	11/24/2020	0.30	300.00	\$90.00	Communicate with FDBR team regarding summary judgment opposition.
Clay J.	Pierce	11/24/2020	2.50	700.00	\$1,750.00	Review defendants' motion for summary judgment; emails regarding same.
Brian P.	Morgan	12/3/2020	0.40	300.00	\$120.00	Participate in group call regarding opposition to summary judgment motion.
Vijayasri	Aryama	12/3/2020	0.60	300.00	\$180.00	Review Defendants' summary judgment brief (0.5); draft email to co-counsel (0.1).
Brian P.	Morgan	12/9/2020	1.70	300.00	\$510.00	Review outline and participate in calls regarding summary judgment motion.
Clay J.	Pierce	12/9/2020	0.80	700.00	\$560.00	Team call regarding opposition to defendants' motion for summary judgment; review and comment on outline for same; emails regarding same.
Vijayasri	Aryama	12/9/2020	0.40	300.00	\$120.00	Discussion with B. Morgan and I. Smith, regarding opposition to summary judgment.
Isaac T.R.	Smith	12/14/2020	4.50	300.00	\$1,350.00	Review SJ filings and response outlines
Vijayasri	Aryama	12/15/2020	1.40	300.00	\$420.00	Review case law for opposition to Defendants' summary judgment motion.
Vijayasri	Aryama	12/16/2020	4.10	300.00	\$1,230.00	Research for opposition to Defendants' summary judgment motion (2.5); draft and revise portions of opposition (1.6).
Vijayasri	Aryama	12/17/2020	8.90	300.00	\$2,670.00	Review Defendants' brief (0.5); research and draft opposition to Defendants' motion for summary judgment (8.4).
Isaac T.R.	Smith	12/17/2020	5.50	300.00	\$1,650.00	Review cases cited in Defendants' SJ brief and draft response section
Brian P.	Morgan	12/21/2020	3.00	300.00	\$900.00	Review brief in opposition to defendants' motion for summary judgment.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Clay J.	Pierce	12/22/2020	1.80	700.00	\$1,260.00	Emails regarding draft papers opposing defendants' motion for summary judgment; review same.
Brian P.	Morgan	12/29/2020	0.60	300.00	\$180.00	Review comments to SJ brief.
Isaac T.R.	Smith	12/29/2020	3.80	300.00	\$1,140.00	Revise Plaintiffs' summary judgment response brief and research regarding the same
Brian P.	Morgan	12/30/2020	4.00	300.00	\$1,200.00	Revise brief in opposition to defendants' motion for summary judgment.
Vijayasri	Aryama	12/30/2020	3.20	300.00	\$960.00	Review and revise brief section based on co-counsel comments (1.2); review and revise brief section based on additional comments (2).
Andrew L.	Van Houter	1/3/2021	1.40	300.00	\$420.00	Revise opposition to summary judgment and response to Defendants' statement of material facts.
Brian P.	Morgan	1/4/2021	2.70	300.00	\$810.00	Revise brief in opposition to motion for summary judgment.
Clay J.	Pierce	1/4/2021	3.20	700.00	\$2,240.00	Revisions to draft brief opposing defendants' motion for summary judgment; emails, telephone conferences regarding same.
Andrew L.	Van Houter	1/4/2021	5.50	300.00	\$1,650.00	Revise opposition to summary judgment and response to Defendants' Statement of Facts and discussions regarding same.
Vijayasri	Aryama	1/4/2021	2.30	300.00	\$690.00	Review, edit, and cite check portions of summary judgment opposition brief (2.2); draft email to B. Morgan concerning opposition brief (0.1).
Brian P.	Morgan	1/5/2021	3.70	300.00	\$1,110.00	Review, revise, finalize and file brief in opposition to motion for summary judgment.
Clay J.	Pierce	1/5/2021	0.80	700.00	\$560.00	Emails, telephone conferences regarding filing of papers opposing defendants' motion for summary judgment.
Andrew L.	Van Houter	1/5/2021	3.50	300.00	\$1,050.00	Revise response to statement of material facts.
Mark E.	Ruggiero	1/5/2021	1.60	150.00	\$240.00	Review, analyze, and cite check draft summary judgment response.
Isaac T.R.	Smith	1/5/2021	0.40	300.00	\$120.00	Revise response to Defendants summary judgment motion
Andrew L.	Van Houter	1/6/2021	2.00	300.00	\$600.00	Analyze Defendant's brief in opposition to summary judgment and draft outline for reply.
Vijayasri	Aryama	1/6/2021	0.20	300.00	\$60.00	Review Defendants' opposition brief.
Brian P.	Morgan	1/7/2021	0.20	300.00	\$60.00	Review opposition to motion for summary judgment.
Clay J.	Pierce	1/7/2021	0.30	700.00	\$210.00	Emails regarding outline for reply papers in further support of motion to dismiss.
Andrew L.	Van Houter	1/7/2021	0.40	300.00	\$120.00	Teleconference regarding reply in support of summary judgment.
Vijayasri	Aryama	1/7/2021	0.50	300.00	\$150.00	Review Defendants' opposition to Plaintiffs' motion for summary judgment.
Vijayasri	Aryama	1/13/2021	2.10	300.00	\$630.00	Review briefs to prepare reply brief argument sections (0.6); draft portions of argument (0.5); research case law (1).
Andrew L.	Van Houter	1/14/2021	1.00	300.00	\$300.00	Revise reply in support of summary judgment.
Vijayasri	Aryama	1/14/2021	4.80	300.00	\$1,440.00	Review case law for summary judgment reply brief (2.8); draft and revise argument section (2).
Vijayasri	Aryama	1/15/2021	1.30	300.00	\$390.00	Incorporate A. Van Houter edits, review, and revise reply brief argument section.
Clay J.	Pierce	1/18/2021	0.60	700.00	\$420.00	Review draft summary judgment reply brief.
Brian P.	Morgan	1/21/2021	0.30	300.00	\$90.00	Review reply brief.
Brian P.	Morgan	1/25/2021	0.50	300.00	\$150.00	Revise reply brief.
Clay J.	Pierce	1/25/2021	3.00	700.00	\$2,100.00	Revise summary judgment reply brief.
Vijayasri	Aryama	1/25/2021	5.40	300.00	\$1,620.00	Research local rule and revise summary judgment reply brief (0.5); review, revise, and perform record cite check of summary judgment reply brief (4.9).
Mark E.	Ruggiero	1/25/2021	1.20	150.00	\$180.00	Review and cite check draft reply brief.
Brian P.	Morgan	1/26/2021	1.00	300.00	\$300.00	Revise reply brief.
Clay J.	Pierce	1/26/2021	0.70	700.00	\$490.00	Emails regarding further revisions to draft summary judgment reply.
Andrew L.	Van Houter	1/26/2021	1.00	300.00	\$300.00	Revise reply brief in support of summary judgment; analyze defendants' reply brief.
Vijayasri	Aryama	1/26/2021	2.20	300.00	\$660.00	Last edits and revisions to summary judgment reply brief
Clay J.	Pierce	2/2/2021	0.30	700.00	\$210.00	Emails regarding request for oral argument on motion for summary judgment.
Andrew L.	Van Houter	2/4/2021	0.30	300.00	\$90.00	Draft and file letter requesting oral argument.
Andrew L.	Van Houter	2/5/2021	0.50	300.00	\$150.00	Correspondence with court concerning scheduling oral argument and follow up regarding same.
Clay J.	Pierce	2/10/2021	0.50	700.00	\$350.00	Emails regarding oral argument for summary judgment motions.
Andrew L.	Van Houter	2/10/2021	0.10	300.00	\$30.00	Correspondence with Defendants' counsel concerning scheduling oral argument for summary judgment.
Clay J.	Pierce	2/16/2021	1.80	700.00	\$1,260.00	Review final summary judgment filings.
Vijayasri	Aryama	3/12/2021	0.10	300.00	\$30.00	Draft email to TAB litigation team.
Clay J.	Pierce	3/25/2021	0.70	700.00	\$490.00	Telephone conference with co-counsel regarding summary judgment argument strategy.
Andrew L.	Van Houter	3/30/2021	0.30	300.00	\$90.00	Analyze summary judgment briefing in preparation for argument regarding same.
Andrew L.	Van Houter	4/1/2021	3.50	300.00	\$1,050.00	Analyze summary judgment briefing and draft questions for preparation of argument for same.
Andrew L.	Van Houter	4/6/2021	1.00	300.00	\$300.00	Attend moot argument in preparation for summary judgment.
Vijayasri	Aryama	4/6/2021	1.90	300.00	\$570.00	Review summary judgment briefing (0.9); oral argument preparation (1).
Brian P.	Morgan	4/9/2021	2.00	300.00	\$600.00	Prepare for and participate in SJ argument prep session.
Clay J.	Pierce	4/9/2021	1.00	700.00	\$700.00	Team moot in preparation for 4/13 summary judgment argument.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Vijayasri	Aryama	4/9/2021	1.60	300.00	\$480.00	Oral argument preparation.
Clay J.	Pierce	4/12/2021	0.20	700.00	\$140.00	Emails with court regarding change of time for 4/13 summary judgment oral argument.
Clay J.	Pierce	4/13/2021	2.50	700.00	\$1,750.00	Attend oral argument on summary judgment; follow up team call regarding same.
Clay J.	Pierce	10/1/2021	0.70	700.00	\$490.00	Review decision on summary judgment motions; emails regarding same with plaintiffs' counsel group.
Andrew L.	Van Houter	10/1/2021	1.50	300.00	\$450.00	Analyze summary judgment decision.
Clay J.	Pierce	10/4/2021	0.40	700.00	\$280.00	Emails regarding proposed call for discussion of summary judgment opinion.
Andrew L.	Van Houter	10/4/2021	0.60	300.00	\$180.00	Analyze prior settlement discussions and correspondence with co-counsel concerning same.
Clay J.	Pierce	10/6/2021	1.50	700.00	\$1,050.00	Emails regarding potential motion to reargue; review court opinion on summary judgment.
Andrew L.	Van Houter	10/6/2021	0.60	300.00	\$180.00	Research concerning potential motion for reargument.
Brian P.	Morgan	10/7/2021	1.90	300.00	\$570.00	Prepare for and participate in call with case team regarding response to summary judgment ruling.
Brian P.	Morgan	10/15/2021	0.50	300.00	\$150.00	Review and revise response to settlement offer.
Clay J.	Pierce	10/18/2021	1.40	700.00	\$980.00	Emails, telephone conferences with A. Van Houter, co-counsel regarding draft joint letter to Court, dispute with opposition counsel regarding proposed edits to same.
Andrew L.	Van Houter	10/18/2021	2.00	300.00	\$600.00	Draft joint letter to court regarding case and settlement status and numerous communications regarding same.
Andrew L.	Van Houter	10/19/2021	0.10	300.00	\$30.00	Analyze court order regarding case management conference.
Andrew L.	Van Houter	1/25/2022	0.10	300.00	\$30.00	Correspondence concerning settlement proposal.
Clay J.	Pierce	2/14/2022	0.50	700.00	\$350.00	Emails with plaintiffs' group regarding potential settlement negotiations, upcoming deadlines.
Andrew L.	Van Houter	2/14/2022	0.40	300.00	\$120.00	Correspondence concerning settlement and case status.
Andrew L.	Van Houter	2/15/2022	0.10	300.00	\$30.00	Correspondence concerning adjournment of filing of pre-trial order.
Andrew L.	Van Houter	2/16/2022	0.30	300.00	\$90.00	Correspondence concerning settlement and pre-trial order.
Andrew L.	Van Houter	2/18/2022	0.40	300.00	\$120.00	Draft letter request for extension of time to enter pretrial order and correspondence regarding same.
Clay J.	Pierce	2/21/2022	0.80	700.00	\$560.00	Edits to draft letter seeking extension on parties' pre-trial findings; finalize and file same.
Andrew L.	Van Houter	2/21/2022	0.30	300.00	\$90.00	Revise letter to court requesting extension and file same.
Brenda	Diaz	2/21/2022	0.40	150.00	\$60.00	Assistance with letter to court and filing of same.
Andrew L.	Van Houter	2/24/2022	0.10	300.00	\$30.00	Analyze order regarding pre-trial order.
Andrew L.	Van Houter	3/1/2022	1.00	300.00	\$300.00	Analyze proposed settlement agreement and communications concerning same.
Clay J.	Pierce	3/2/2022	0.50	700.00	\$350.00	Emails with co-counsel regarding revised settlement demand to defendants.
Andrew L.	Van Houter	3/2/2022	0.30	300.00	\$90.00	Revise settlement proposal and communications regarding same.
Clay J.	Pierce	3/14/2022	0.30	700.00	\$210.00	Emails regarding settlement negotiations.
Andrew L.	Van Houter	3/14/2022	0.20	300.00	\$60.00	Correspondence concerning settlement.
Clay J.	Pierce	3/18/2022	0.20	700.00	\$140.00	Emails regarding settlement negotiations.
Andrew L.	Van Houter	3/18/2022	0.10	300.00	\$30.00	Communications concerning settlement.
Andrew L.	Van Houter	4/5/2022	0.10	300.00	\$30.00	Correspondence concerning settlement agreement.
Andrew L.	Van Houter	4/6/2022	0.10	300.00	\$30.00	Communications concerning settlement.
Andrew L.	Van Houter	4/12/2022	0.10	300.00	\$30.00	Correspondence concerning settlement agreement.
Andrew L.	Van Houter	4/14/2022	0.80	300.00	\$240.00	Analyze Defendant's revisions to proposed settlement.
Andrew L.	Van Houter	4/15/2022	0.20	300.00	\$60.00	Correspondence concerning settlement proposal.
Andrew L.	Van Houter	4/19/2022	0.30	300.00	\$90.00	Numerous correspondence concerning settlement.
Andrew L.	Van Houter	4/24/2022	0.20	300.00	\$60.00	Communications concerning settlement.
Brian P.	Morgan	4/25/2022	1.50	300.00	\$450.00	Review correspondence related to settlement and participate in call with plaintiffs' counsel.
Andrew L.	Van Houter	4/25/2022	1.00	300.00	\$300.00	Numerous communications and meetings concerning settlement.
Andrew L.	Van Houter	4/26/2022	0.20	300.00	\$60.00	Correspondence concerning settlement.
Andrew L.	Van Houter	4/27/2022	0.20	300.00	\$60.00	Communications concerning settlement and trial dates.
Andrew L.	Van Houter	4/28/2022	0.20	300.00	\$60.00	Communications concerning settlement.
Andrew L.	Van Houter	5/2/2022	0.40	300.00	\$120.00	Numerous correspondence concerning stay of trial dates while parties pursue settlement agreement.
Andrew L.	Van Houter	5/6/2022	0.20	300.00	\$60.00	Correspondence concerning settlement.
Clay J.	Pierce	5/11/2022	0.50	700.00	\$350.00	Emails regarding settlement negotiations.
Andrew L.	Van Houter	5/11/2022	0.50	300.00	\$150.00	Numerous correspondence concerning settlement agreement.
Vijayasri	Aryama	5/19/2022	0.20	300.00	\$60.00	Review docket and calendar upcoming case deadlines.
Brian P.	Morgan	5/20/2022	1.20	300.00	\$360.00	Participate in conference call regarding revisions to settlement agreement.
Andrew L.	Van Houter	5/20/2022	2.10	300.00	\$630.00	Analyze draft settlement agreement; call with co-counsel to discuss draft settlement.
Vijayasri	Aryama	5/20/2022	2.10	300.00	\$630.00	Review settlement proposal and discuss with litigation team.
Clay J.	Pierce	5/23/2022	0.50	700.00	\$350.00	Review edits to draft stipulation and order of settlement; emails regarding same.
Andrew L.	Van Houter	5/24/2022	0.50	300.00	\$150.00	Revise settlement agreement.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Andrew L.	Van Houter	5/24/2022	0.20	300.00	\$60.00	Correspondence concerning settlement agreement.
Andrew L.	Van Houter	5/25/2022	0.40	300.00	\$120.00	Draft email to Defense counsel regarding proposed settlement.
Vijayasri	Aryama	5/26/2022	1.50	300.00	\$450.00	Review J. Torres' preferences and docket and draft letter requesting further adjournment of case deadlines.
Andrew L.	Van Houter	5/27/2022	0.20	300.00	\$60.00	Revise status letter to court and communications concerning same.
Vijayasri	Aryama	5/27/2022	0.60	300.00	\$180.00	Draft emails to litigation team and to opposing counsel concerning joint status letter.
Vijayasri	Aryama	5/31/2022	0.10	300.00	\$30.00	Draft follow up email to H. Hechtkopf and I. Lipton to seek consent to file joint status letter.
Clay J.	Pierce	6/1/2022	0.60	700.00	\$420.00	Emails regarding letter to court requesting additional adjournment of trial and pre-trial deadlines.
Vijayasri	Aryama	6/1/2022	0.30	300.00	\$90.00	Draft response to H. Hechtkopf; draft email to B. Diaz concerning filing of joint status letter; calendar deadline for next joint status letter.
Andrew L.	Van Houter	6/27/2022	0.20	300.00	\$60.00	Correspondence concerning settlement agreement.
Andrew L.	Van Houter	6/30/2022	0.10	300.00	\$30.00	Correspondence with Defendants; counsel concerning settlement and status letter.
Vijayasri	Aryama	6/30/2022	0.30	300.00	\$90.00	Draft case joint status letter.
Andrew L.	Van Houter	7/1/2022	0.30	300.00	\$90.00	Revise joint status letter and correspondence concerning same.
Vijayasri	Aryama	7/1/2022	0.30	300.00	\$90.00	Review and file status letter per Court's request.
Andrew L.	Van Houter	7/6/2022	0.10	300.00	\$30.00	Attention to court order regarding status letter.
Andrew L.	Van Houter	7/14/2022	0.60	300.00	\$180.00	Analyze Defendant's proposed settlement agreement and correspondence regarding same.
Vijayasri	Aryama	7/14/2022	0.30	300.00	\$90.00	Draft joint status letter.
Andrew L.	Van Houter	7/15/2022	0.10	300.00	\$30.00	Call to H. Hetchkopf regarding settlement agreement.
Andrew L.	Van Houter	7/17/2022	0.30	300.00	\$90.00	Correspondence regarding settlement; revise status letter to court regarding same.
Andrew L.	Van Houter	7/18/2022	0.20	300.00	\$60.00	Correspondence concerning status report.
Vijayasri	Aryama	7/18/2022	0.40	300.00	\$120.00	Review and send draft status letter to H. Hechtkopf.
Andrew L.	Van Houter	7/19/2022	0.20	300.00	\$60.00	Revise joint status letter.
Clay J.	Pierce	7/21/2022	0.90	700.00	\$630.00	Emails, telephone conferences with A. Van Houter, co-counsel regarding settlement negotiations.
Andrew L.	Van Houter	7/21/2022	0.70	300.00	\$210.00	Teleconference with H. Hetchkopf regarding settlement and numerous correspondence concerning same.
Clay J.	Pierce	7/22/2022	0.70	700.00	\$490.00	Emails, telephone conferences with co-counsel, A. Van Houter regarding settlement negotiations, proposed team call.
Clay J.	Pierce	7/25/2022	0.80	700.00	\$560.00	Conference with co-counsel regarding settlement negotiations.
Andrew L.	Van Houter	7/25/2022	2.10	300.00	\$630.00	Teleconference with co-counsel concerning settlement and prepare for same; draft settlement counter-proposal points.
Vijayasri	Aryama	7/25/2022	0.30	300.00	\$90.00	Draft emails to team concerning settlement proposal and mediation program.
Vijayasri	Aryama	7/25/2022	0.50	300.00	\$150.00	Review settlement proposal.
Andrew L.	Van Houter	7/26/2022	0.10	300.00	\$30.00	Correspondence concerning settlement.
Andrew L.	Van Houter	7/26/2022	0.20	300.00	\$60.00	Communications concerning potential settlement.
Andrew L.	Van Houter	7/27/2022	0.30	300.00	\$90.00	Communications with Defendants' counsel regarding potential settlement.
Andrew L.	Van Houter	7/28/2022	0.10	300.00	\$30.00	Communications with Defendants' counsel concerning settlement.
Andrew L.	Van Houter	7/29/2022	0.30	300.00	\$90.00	Communications concerning settlement negotiations.
Andrew L.	Van Houter	8/1/2022	0.20	300.00	\$60.00	Correspondence with Defendants' counsel regarding mediation.
Andrew L.	Van Houter	8/2/2022	1.30	300.00	\$390.00	Numerous communications concerning Defendants' refusal to mediate; develop strategy for response to same; draft letter to court requesting referral to mediation.
Vijayasri	Aryama	8/2/2022	0.50	300.00	\$150.00	Draft settlement status letter.
Vijayasri	Aryama	8/2/2022	0.10	300.00	\$30.00	Draft email to A. Van Houter concerning mediation.
Andrew L.	Van Houter	8/3/2022	0.40	300.00	\$120.00	Numerous communications regarding draft letter to court requesting mediation.
Andrew L.	Van Houter	8/4/2022	0.50	300.00	\$150.00	Revise letter to Court regarding settlement status and numerous communications concerning same.
Andrew L.	Van Houter	8/5/2022	0.60	300.00	\$180.00	Revise letter to court regarding settlement status and file same; numerous communications regarding same.
Andrew L.	Van Houter	8/7/2022	0.20	300.00	\$60.00	Communications concerning settlement conference.
Andrew L.	Van Houter	8/8/2022	0.40	300.00	\$120.00	Teleconference with co-counsel concerning settlement conference and follow up regarding same.
Andrew L.	Van Houter	8/9/2022	0.40	300.00	\$120.00	Teleconference with co-counsel concerning settlement conference.
Andrew L.	Van Houter	8/10/2022	1.00	300.00	\$300.00	Prepare for settlement conference.
Andrew L.	Van Houter	8/11/2022	2.00	300.00	\$600.00	Prepare for settlement conference; attend settlement conference; debrief regarding same.
Andrew L.	Van Houter	8/12/2022	1.20	300.00	\$360.00	Correspondence and videoconference with co-counsel regarding settlement strategy.
Andrew L.	Van Houter	8/15/2022	0.70	300.00	\$210.00	Correspondence concerning settlement.
Andrew L.	Van Houter	8/16/2022	0.20	300.00	\$60.00	Analyze proposed changes to settlement agreement.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Andrew L.	Van Houter	8/17/2022	2.60	300.00	\$780.00	Revise settlement agreement.
Andrew L.	Van Houter	8/18/2022	1.20	300.00	\$360.00	Revise settlement agreement and numerous communications regarding same.
Andrew L.	Van Houter	8/19/2022	0.60	300.00	\$180.00	Revise settlement agreement; communications with Defendants' counsel regarding same; communications with co-counsel regarding same.
Andrew L.	Van Houter	8/29/2022	0.50	300.00	\$150.00	Draft status letter to court and correspondence regarding same.
Andrew L.	Van Houter	8/30/2022	0.20	300.00	\$60.00	Correspondence regarding settlement.
Andrew L.	Van Houter	9/1/2022	0.20	300.00	\$60.00	Correspondence concerning settlement; finalize status letter.
Clay J.	Pierce	9/7/2022	1.00	700.00	\$700.00	Video conference with plaintiffs' counsel regarding fee demand to defendants.
Andrew L.	Van Houter	9/7/2022	0.50	300.00	\$150.00	Meeting with co-counsel regarding fee request.
Andrew L.	Van Houter	9/9/2022	0.30	300.00	\$90.00	Communications concerning settlement.
Andrew L.	Van Houter	9/12/2022	0.70	300.00	\$210.00	Numerous communications concerning settlement and discussions with S. Aryama regarding same.
Clay J.	Pierce	9/12/2022	0.40	700.00	\$280.00	Emails regarding proposed settlement conference.
Andrew L.	Van Houter	9/13/2022	0.60	300.00	\$180.00	Review and edit time calculations for attorneys fees demand and numerous correspondence concerning same.
Andrew L.	Van Houter	9/15/2022	0.20	300.00	\$60.00	Correspondence concerning settlement.
Andrew L.	Van Houter	9/16/2022	1.00	300.00	\$300.00	Draft correspondence concerning attorneys' fees demand and numerous correspondence concerning same.
Andrew L.	Van Houter	10/7/2022	0.10	300.00	\$30.00	Correspondence concerning settlement agreement.
Andrew L.	Van Houter	10/19/2022	0.10	300.00	\$30.00	Communications concerning settlement.
Andrew L.	Van Houter	10/20/2022	0.10	300.00	\$30.00	Communications concerning settlement.
Andrew L.	Van Houter	10/21/2022	0.20	300.00	\$60.00	Correspondence concerning mediation.
Andrew L.	Van Houter	10/26/2022	0.10	300.00	\$30.00	Correspondence concerning settlement conference.
Andrew L.	Van Houter	10/27/2022	0.20	300.00	\$60.00	Communications concerning mediation.
Clay J.	Pierce	10/27/2022	0.40	700.00	\$280.00	Emails regarding proposed mediation.
Andrew L.	Van Houter	10/31/2022	0.10	300.00	\$30.00	Correspondence concerning mediation.
Andrew L.	Van Houter	11/1/2022	0.10	300.00	\$30.00	Correspondence concerning mediation.
Brian P.	Morgan	11/4/2022	0.50	300.00	\$150.00	Correspondence regarding settlement proposals / mediation.
Andrew L.	Van Houter	11/4/2022	0.60	300.00	\$180.00	Teleconference with H. Hetchkopf regarding settlement and communications with co-counsel regarding same.
Andrew L.	Van Houter	11/15/2022	0.10	300.00	\$30.00	Analyze court's order regarding mediation.
Andrew L.	Van Houter	11/16/2022	0.10	300.00	\$30.00	Correspondence concerning mediation.
Vijayasri	Aryama	11/18/2022	5.80	300.00	\$1,740.00	Calculate attorneys' fees by organization in preparation for settlement conference and related submissions.
Clay J.	Pierce	11/18/2022	1.00	700.00	\$700.00	Confer with co-counsel regarding mediation, preparation for same.
Andrew L.	Van Houter	11/18/2022	1.00	300.00	\$300.00	Videoconference with co-counsel concerning mediation.
Andrew L.	Van Houter	11/21/2022	0.60	300.00	\$180.00	Numerous communications concerning mediation statement and fees and expenses.
Vijayasri	Aryama	11/21/2022	0.50	300.00	\$150.00	Review and revise calculations for attorneys' fees and expenses.
Vijayasri	Aryama	11/22/2022	0.70	300.00	\$210.00	Review and revise calculations of attorneys' fees and expenses.
Andrew L.	Van Houter	11/22/2022	1.10	300.00	\$330.00	Draft introduction to mediation statement; attention to calculation of expenses; correspondence concerning mediation.
Vijayasri	Aryama	11/22/2022	3.80	300.00	\$1,140.00	Analyze various settlement proposals and prepare chart of negotiated points in anticipation of upcoming settlement conference.
Andrew L.	Van Houter	11/23/2022	0.50	300.00	\$150.00	Correspondence concerning joint letter to court regarding mediation.
Vijayasri	Aryama	11/23/2022	0.20	300.00	\$60.00	Discussion with A. Van Houter concerning preparation of materials for settlement conference.
Vijayasri	Aryama	11/23/2022	0.30	300.00	\$90.00	Review various settlement proposal drafts.
Vijayasri	Aryama	11/23/2022	3.90	300.00	\$1,170.00	Analyze various settlement proposals and prepare chart of negotiated points in anticipation of upcoming settlement conference.
Andrew L.	Van Houter	11/28/2022	2.50	300.00	\$750.00	Correspondence concerning mediation statement.
Clay J.	Pierce	11/28/2022	1.20	700.00	\$840.00	Comments to draft mediation statement; emails, telephone conferences regarding same with FDBR team.
Vijayasri	Aryama	11/28/2022	4.60	300.00	\$1,380.00	Review and revise settlement conference materials.
Vijayasri	Aryama	11/29/2022	0.90	300.00	\$270.00	Prepare materials for C. Pierce for settlement conference.
Clay J.	Pierce	12/1/2022	5.80	700.00	\$4,060.00	Mediation conference.
Andrew L.	Van Houter	12/3/2022	0.10	300.00	\$30.00	Correspondence concerning settlement proposal.
Andrew L.	Van Houter	12/8/2022	0.20	300.00	\$60.00	Communications concerning settlement.
Andrew L.	Van Houter	12/9/2022	0.10	300.00	\$30.00	Correspondence concerning settlement.
Andrew L.	Van Houter	12/15/2022	0.10	300.00	\$30.00	Correspondence concerning settlement.
Andrew L.	Van Houter	12/16/2022	0.10	300.00	\$30.00	Correspondence concerning settlement.
Clay J.	Pierce	12/16/2022	0.50	700.00	\$350.00	Correspondence with co-counsel regarding joint status letter to Court.
Andrew L.	Van Houter	1/10/2023	0.50	300.00	\$150.00	Review draft settlement agreement and comment on same.
Clay J.	Pierce	1/11/2023	0.40	700.00	\$280.00	Emails regarding settlement negotiations.
Clay J.	Pierce	1/18/2023	0.30	700.00	\$210.00	Emails with plaintiffs' counsel regarding settlement negotiations.
Vijayasri	Aryama	2/1/2023	0.40	300.00	\$120.00	Draft emails to A. Van Houter and litigation team concerning upcoming deadlines for case status letter.

Nathaniel Robinson, et al. v. New York City Transit Authority, et al., No. 1:19-cv-01404 (S.D.N.Y.) Faegre Drinker Biddle & Reath LLP - Attorney's Fees						
First Name	Last Name	Work Date	Hours	Adjusted Billing Rate	Adjusted Total Bill	Narrative
Andrew L.	Van Houter	2/1/2023	0.10	300.00	\$30.00	Correspondence concerning settlement and letter to the court.
Clay J.	Pierce	2/2/2023	0.40	700.00	\$280.00	Emails regarding settlement negotiation update.
Andrew L.	Van Houter	2/3/2023	0.10	300.00	\$30.00	Correspondence concerning settlement.
Vijayasri	Aryama	3/1/2023	0.30	300.00	\$90.00	Draft emails to team regarding court-ordered status letter.
Vijayasri	Aryama	3/2/2023	0.50	300.00	\$150.00	Draft emails to A. Van Houter concerning upcoming status letter.
Andrew L.	Van Houter	3/2/2023	0.20	300.00	\$60.00	Review proposed settlement agreement and correspondence regarding same.
Andrew L.	Van Houter	4/3/2023	0.10	300.00	\$30.00	Correspondence concerning preliminary approval papers.
Vijayasri	Aryama	4/6/2023	1.00	300.00	\$300.00	Draft extension request letter.
Vijayasri	Aryama	4/7/2023	0.40	300.00	\$120.00	Discussion with opposing counsel regarding extension request, and review of request letter.
Clay J.	Pierce	4/24/2023	0.80	700.00	\$560.00	Review motion for settlement approval.
Vijayasri	Aryama	5/8/2023	0.60	300.00	\$180.00	Draft emails concerning billing records and attorneys' fees calculations.
Andrew L.	Van Houter	5/8/2023	0.10	300.00	\$30.00	Correspondence concerning consent to magistrate judge regarding fees motion.
Andrew L.	Van Houter	5/16/2023	0.10	300.00	\$30.00	Correspondence with S. Aryama concerning fee calculations.
Vijayasri	Aryama	5/24/2023	0.20	300.00	\$60.00	Call A. Van Houter regarding attorneys' fees calculations.
Andrew L.	Van Houter	7/24/2023	0.20	300.00	\$60.00	Correspondence concerning fee request.
TOTAL			2,255.10		\$889,470.00	